



REPORT No 2

Promo-LEX Observation Mission for the Early Parliamentary Elections of 11 July 2021

Observation period: 12-25 May 2021

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Kingdom of the Netherlands



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The responsibility for the view shared in this Report belongs to Promo-LEX Association and does not necessarily reflect the opinion of donors. If there are any discrepancies between the text in Romanian and its translation, the provisions formulated in Romanian shall prevail.

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EXECUTIVE SUMMARY

Legal Framework. By the end of the observation period, though the election organisation and electoral campaigning have already started, clear measures of preventing and controlling the spread of COVID-19 infection in electoral context have not been approved. On the one hand, the Instruction applied during the presidential elections was not adjusted and on the other hand, a new Instruction was approved. In this situation, the risk of contamination with COVID-19 infection could increase.

Also, Promo-LEX OM draws the attention to some uncertainties related to the constitutionality of Article 51(4) of the Electoral Code. The uncertainty refers to the prohibition to hold candidates to account or impose any sanctions during the electoral period without the consent of the electoral body that registered them. Given that a provision with exactly the same form and content as Article 51(4) of the Electoral Code has been declared previously non-constitutional, Promo-LEX OM believes that the above article should not and may not be applied by authorities, and the electoral contenders may not use these safeguards.

Thus, Promo-LEX OM finds that there is also no Government Decision to ensure full coverage of expenses for the organisation of the early parliamentary elections. We reiterate the concern related to the uncertainty in the central public authorities' capacity to identify enough funds for a smooth conduct of the elections.

Electoral bodies. During the reference period, CEC convened in a mixed format (online and with physical presence) for six meetings. A number of 63 decisions were approved in order to organise the parliamentary elections. In this context, a regulation was approved and other two were adjusted to the legal norms specific to the proportional system. Promo-LEX welcomes the approval by CEC of the Regulation on the Coverage of Election Campaign, which contains provisions that prohibit hate speech and incitement to discrimination during electoral debates, as well as broadcasting electoral spots and reports that are likely to propagate, promote or justify racial hate, xenophobia, anti-Semitism or other forms of hate. Also, we note the amendment of the Regulation on DEC operation, which allows to conduct the online meetings of the electoral body. In this respect, according to Promo-LEX, ensuring the access of observers to the online meetings should be a matter of priority.

At the same time, according to Promo-LEX, at least five more CEC regulations need to be adapted to the Electoral Code. Until 25 May 2021, the Commission accredited 77 observers, of whom 68 national observers (Promo-LEX) and 9 international observers.

CEC established 38 level-two constituencies and 37 district electoral councils (DECs) within legal deadlines. A DEC was not established in the constituency No 3 from Bender. Parliamentary parties appointed members in all DECs. The membership of the councils is gender-unbalanced: 67% – women and 33% – men. In at least two DECs, the membership was already changed.

Promo-LEX OM identified at least one case that could be qualified as conduct of opinion polls without notifying CEC in advance.

Promo-LEX OM, after stopping the preliminary registration, calculated the distribution of polling stations abroad. The information gathered during the presidential elections was used as statistical data about the number of citizens from abroad because the updated data sent by MFAEI and CEC to the observers are incomplete and could not be taken into account.

We want to draw attention to the increase in the number of preliminary registrations by about 40,000 as compared with the presidential elections of 2020. According to Promo-LEX estimates, in 8 countries, the number of polling stations changed on the basis of the indicator regarding the number of preliminary registrations. Thus, the preliminary registration is still the only indicator through which citizens can influence the authorities as regards the number and geographical location of the polling stations.

As regards the distribution of polling stations per country, according to Promo-LEX estimates and if we take into account those 150 PS budgeted by CEC as a calculation basis, the highest number of

polling stations will be established in Italy (28), Russian Federation (21), Germany (13), United Kingdom (11), France (9) and Romania (9).

Also, based on the 191 PS proposed by MFAEI, the highest number of PS will be established in Italy (37), Russian Federation (29), Germany (17), United Kingdom (16), France (12) and Romania (11).

Contender nomination and registration. As of 26 May 2021, CEC have registered eight contenders (six parties and two electoral blocs), and other two files are under review. The list of candidates comply with the gender quota. The rejected registration application were not appealed. At the same time, no independent candidate was registered.

Public administration. Promo-LEX OM found flaws in the way LPAs fulfill their duties of ensuring a transparent and correct electoral process. According to observers, only 19 (56%) of all 34 LPAs visited had approved decisions on places for electoral posters and venues for meetings with voters. Of these 19 LPAs, only 10 (about 29%) displayed the decisions on the locality's information panel.

Promo-LEX observers also found a case when LPAs approved decisions on places for electoral posters in violation of CEC Regulation on the Placement of Electoral Advertising. Such cases involve nominating fences as places for electoral posters.

According to our findings, during the current elections the LPAs again overlook their duties to appoint members of electoral bodies. Promo-LEX OM identified at least seven DEC II (19%) with no members appointed by level-two LPAs.

Electoral contestants. Promo-LEX OM draws the attention that most of the contenders started campaigning without registering their trustees with CEC.

Promo-LEX observers reported at least 18 cases (17 – BECS, 1 – AUR) of campaigning before the legal term, urging to vote for a certain electoral contender / potential electoral contender.

At least 46 activities were reported to be conducted by four electoral contenders between 21 and 25 May 2021 - PAS (80%), BECS (11%), BERU (7%) and PPS (2%). The most popular electoral activities included dissemination of electoral materials (63%) and meetings with voters (28%).

During the observed period, at least 121 cases (BECS) were identified that can be regarded as use of administrative resources for electoral promotion. Of them, in 120 cases public sector employees were involved in campaigning activities and one case was about taking merits for services funded with public money.

In addition, at least 2 cases were reported that can be regarded as gifts with electoral impact (BECS - 1, BERU - 1).

We also mention one case that can be regarded as involving the President of the Republic of Moldova in campaigning for an electoral contender - PAS.

Observation of electoral funding. During the reporting period, CEC established the general threshold for the funds that can be transferred on the 'Electoral Fund' account of the electoral contender and of the initiative group. Thus, the maximum amount that can be accumulated to support financially an electoral contender is MDL 20,707,700. As a comparison, note that the threshold for the 2019 Parliamentary Elections amounted to MDL 86,871,856. The significant difference between the amounts established in 2019 and 2021 was caused by the amendments made to the Electoral Code (August 2019) and the set threshold of 0.05% of the forecast revenue of the state budget for the respective year. The amount of loans for electoral contenders was set at MDL 50,000, similarly with the 2019 Parliamentary Elections.

According to Promo-LEX observers, as of 25 May 2021 CEC has not published on its website any report of the political parties at the onset of the election campaign (the report must be submitted by the political parties that intend to make transfers on the 'Electoral Fund' account from the political party's account). In addition, according to the data published on CEC website, as of 25 May 2021 only

PAS presented information on opening the 'Electoral Fund' account, though CED set the deadline on 26 May 2021.

Hate speech. During 11-24 May 2021, Promo-LEX OM identified at least 24 cases of hate speech and incitement to discrimination in the public space, in the media and in the online environment of the Republic of Moldova. The hate speech and incitement to discrimination took the form of xenophobic, racist, sexist and other discriminatory or non-tolerant speeches that promoted stereotypes and preconceived ideas in the public space.

Most of the cases took place online, most frequently on social networks (13 cases). Other 9 cases manifested in the online press (3 cases) and during TV shows (6 cases), and 2 cases were registered during two public events (press conferences).

The hate speech and incitement to discrimination was based on the following criteria: political affiliation, sex/gender, age, opinion, colour, professional activity, race, nationality, ethnic origin, sexual orientation and disability.

This type of discourse affected the following groups: electoral contenders, politicians, members and supporters of political parties, women, men, the elderly, migrants, Muslims, Romanians/speakers of Romanian language, unionists and persons with disabilities.

INTRODUCTION

Report No 2 was developed under the Promo-LEX Observation Mission (OM) of the early Parliamentary Elections of 11 July 2021. The observation period of the events included in the report is 12 – 25 May 2021. The subject of the preliminary registration is monitored until the last day of implementation of the procedure – 26 May 2021. The information about the appointment and registration of contenders is also submitted by 26 May 2021. The results of the monitoring of hate speech and incitement to discrimination are submitted in the period 11 – 24 May 2021.

Promo-LEX OM shall submit a number of six observation interim reports and a final report on the early Parliamentary Elections. On the election day, press releases will be issued on the conduct of the election, the results of the partial counting of votes and the assessment of protocols' accuracy. Promo-LEX OM reports aim at notifying the electoral bodies about the results of the real-time assessment of the quality of organizing and conducting election procedures; raising the accountability of electoral actors; informing the society about the positive and negative tendencies found during the electoral process; preventing possible violations of electoral law.

The Promo-LEX election observation methodology is based on international electoral standards and involves the observation of both long-term (election period) and short-term (election day) elections. The observation reports are developed by Promo-LEX OM central team based on their findings, including those reported by the long-term observers (LTOs) on the activity of all actors involved in the organization and conduct of the elections: electoral contenders, public authorities, electoral bodies, political parties, citizens who submit their own candidacy, as well as civil society.

During the electoral period, the monitoring of the electoral process shall be carried out by 43 LTOs. During field visits, Promo-LEX observers collect and analyse information resulting from interviews, meetings with interviewees and review of the official documents. The activity of electoral candidates/contenders is also monitored on-line. Promo-LEX will also monitor hate speech and discrimination, using 7 monitors. LTO/monitors' findings are reported based on thematic templates and are stored on the web platform www.data.promolex.md, a secure system with limited access, managed by Promo-LEX.

On the election day, Observation Mission will delegate one short-term observer (STO) to about 600 polling stations (PSs), selected on the basis of a nationally representative sample, established by a sociological company. In addition, the electoral process in the other polling stations and their adjacent spaces will be monitored by 160 STOs, grouped and distributed nationwide in 80 mobile teams of observers.

The polling stations set up for voters in the Transnistrian region will be fully monitored by delegating a static STO to each of them. Particular attention will be paid to the electoral process monitoring in polling stations that will be opened abroad. For this purpose, Promo-LEX OM plans to delegate about 60 static STOs on the election day to abroad polling stations.

The activity of the observers is coordinated by the central team of the Mission, composed of 22 members. All Promo-LEX observers and monitors are trained in the workshops organized by the Observation Mission, including on compliance with protection measures related to the COVID-19 pandemic. The observers also sign and undertake to comply with the Code of Conduct¹ of the Promo-LEX Independent National Observatory, committing to act in good faith and in non-partisan way.

The OM of the early Parliamentary Elections of 11 July 2021 is a project of the Promo-LEX Association, carried out within the Civic Coalition for Free and Fair Elections.

The Promo-LEX OM is not a political opponent of the contenders involved in the electoral process, it is not an investigative body and does not assume the express obligation to prove the observed findings. However, the observers' reports are accompanied, as far as possible, by photo and video evidence, other documents, which can only be made available to law enforcement bodies, on the basis of appropriate requests, and in no case, shall it be provided to electoral contenders. At the same time, the violations, including the alleged ones, which are found in this report, must be treated

¹ [The Code of Conduct](#) of the Promo-LEX Independent National Observatory.

by the electoral authorities as notifications and are to be examined according to the competence, in the light of the provisions of Article 22 (1) (q) and Article 68 (5) of the Electoral Code.

The Promo-LEX Mission manages the www.electoral.monitor.md web platform, where any citizen can report activities with electoral overtones. Relevant information from observers' reports are stored on the same platform. Citizens' notifications are verified by the mission observers during the next scheduled visit to the settlement, where the alert was recorded.

Promo-LEX is a public association that aims at developing democracy in the Republic of Moldova, including in the Transnistrian region, by promoting and protecting human rights, monitoring democratic processes and strengthening the civil society. The Association organizes Election Observation Missions in the Republic of Moldova since 2009, the current OM being the 21st. Also, the employees and members of the Association have extensive international experience and participated in election observations in the International Missions of Armenia, Czech Republic, Estonia, Georgia, Germany, Montenegro, Norway, Romania, Serbia, Sweden, Ukraine, etc.

The international standards referred to in this report are those developed by the UN, OSCE, the European Commission for Democracy through Law (Venice Commission), the European Union and the Council of Europe. At the end, the report contains recommendations for public authorities, electoral bodies, electoral contenders, other stakeholders, to ensure the good organization and optimization of the electoral process.

The Observation Mission of the early Parliamentary Elections of 11 July 2021 is conducted by Promo-LEX Association with the financial support of the United States Agency for International Development (USAID) through the 'Democracy, Transparency and Accountability' Program, as well as of the Embassy Office of the Kingdom of Netherlands through the project 'Support for citizen information and observation of early Parliamentary Elections of 2021 in the polling stations created for the voters from the transnistrian region.' The 'hate speech' component is supported by the Justice and Human Rights Department of Soros Moldova Foundation through the project 'Building a platform for the development of activism and education on Human rights in the Republic of Moldova – stage IV'.

The opinions expressed in the reports and press releases of the Promo-LEX OM belong to the authors and do not necessarily reflect the position of the donors.

I. LEGAL FRAMEWORK

At the end of the observation period, in the middle of the organisation process of elections and under the conditions for starting the electioneering, there is no clear regulation on the prevention and control measures of the COVID-19 infection in the electoral context. On the one hand, the Instruction applied during the Presidential Elections was not adjusted, and on the other hand, a new Instruction was not approved. Due to the absence of clear measures on how to carry out the election campaign in a pandemic context, there is a risk of increase of the COVID-19 infection rate.

Promo-LEX OM draws attention to some uncertainties concerning the constitutionality of Article 51(4) of Electoral Code. The uncertainties refer to the prohibition of liability of candidates or subjecting to some sanctions during the election period without approval from the electoral body they are registered with. Assuming that a rule with a form and content similar to the provision of Article 51(4) of Electoral Code was previously declared unconstitutional, Promo-LEX OM claims that it cannot and shall not be applied by the authorities, and the electoral contenders cannot rely on these guarantees.

Further, Promo-LEX OM finds that a Government Decision that may ensure full coverage of expenditure associated to the organisation of early Parliamentary Elections is missing. We reiterate the concern on the existing state of uncertainty regarding the capacity of central public authorities to identify sufficient financial resources for a good development of the election.

1.1. The failure to approve a new Instruction on the organisation and conduct of elections under pandemic conditions or adjust Instruction No 24 of 12.08.2020

On 19 May 2021, CEC requested to be informed by the National Extraordinary Public Health Commission (NEPHC) about the prevention and control measures of the COVID-19 infection that have to be observed in order to cross the state border, in the context of election monitoring by the international observers and foreign journalists. The Commission also requested to be informed about the date of the session planned for the amendment and adjustment of the Instruction No 24 of 12.08.2020 and if any amendments were provided to the list of goods and protective equipment against COVID-19².

Previously, on 6 May 2021, on CEC request, the Ministry of Health, Labour and Social Protection (MHLSP) communicated that the Instruction concerning ‘the way that CEC organizes and carries out elections under the COVID-19 pandemic situation’, approved by the Decision of National Extraordinary Public Health Commission No 24 of 12.08.2020 is complex and does not need significant amendments. Therefore, it also remains up-to-date (applicable) for the good organisation and conduct of early Parliamentary Elections of 11 July 2021, only after having operated the amendments assumed.

However, neither the ‘old’ Instruction was adjusted, nor a new Instruction was approved ‘by 25.05.2021. This is a problem under the conditions of the ongoing organisation of elections, with District Electoral Councils (DEC) already created. Concurrently, the electioneering activities began (for example, electoral concerts with an important number of people).

We remind that after the cancellation of the state of emergency, NEPHC issued only one decision. Thus, according to Decision No 54 of 29 April 2021³, public health emergency may be established by territorial extraordinary public health commissions on the basis of COVID-19 incidence (if in the previous 14 days it exceeded 100 cases per 100 thousand people).

According to the alert level, territorial commissions had to establish public health measures. At the same time, among general prevention and control measures for the COVID-19 infection for individuals, which are applicable at the national level, are:

² [CEC Letter](#) No CEC-8/3950 of 19 May 2021.

³ [Decision](#) No 54 of 29 April 2021.

- compulsory wearing of masks in all indoor and outdoor public spaces;
- observance of physical distance of at least 1 meter;
- observance, under their own responsibility, of the self-isolation regime by people who are subjected to the respective regime;
- observance of the measures imposed by authorities by individuals who are on territories or in institutions in quarantine;
- recommendation to attend public places in groups smaller than 3 people, excepting members of one family;
- recommendation to avoid people aged over 63 years old being outside their house and in public spaces without urgent need.

While the election campaign began on 21.05.2021 for at least six electoral contenders, no special provisions on the way of conducting the campaign under pandemic conditions were established. We note that once registered, the electoral contenders can electioneer during assemblies, rallies and meetings with voters. Therefore, the failure to regulate the conditions for the public electoral meetings may increase the risk of COVID-19 infection, and the regulators and supervisors do not have preventing and sanctioning mechanisms, except for general measures.

In addition, the establishment of special measures by every territorial extraordinary public health commission may confuse electoral contenders, as well as authorities with sanctioning powers.

1.2. Comments on the constitutionality of Article 51 (4) of Electoral Code and the guarantees ensured for the electoral contenders

According to Article 51 (4) of Electoral Code, during the election period, the candidates cannot be dismissed or transferred to another workplace or position without their permission, and they cannot be held criminally accountable, arrested, apprehended or subjected to administrative penalties without approval by the electoral body they are registered with, except for crimes in flagrante delicto.

We point out that a provision similar to the current one in Article 51 (4) is set out in the Electoral Code, from its adoption – 1997 – until the end of 1999, when the Constitutional Court declared the respective provision unconstitutional⁴. The rule declared as unconstitutional provided in Article 46 (6) that ‘Electoral contenders cannot be held criminally accountable, arrested, apprehended or subjected to administrative penalties without approval by the electoral body they are registered with, except for crimes in flagrante delicto’.

Inter alia, the Constitutional Court established that:

- ‘According to the Supreme Law, only the President of the Republic of Moldova (Article 81) and the MPs (Article 70) enjoy immunity as a set of special rights. The members of the diplomatic corps in the Republic of Moldova also enjoy legal protection. As regarding (...) the electoral contenders, neither the Constitution, nor the international rules provide for them any special protection in case of committing any violation or contravention.’
- The rules which are the subject of the notification reveal that electoral bodies, actually, have powers that exclusively belong to courts, which is contrary to Articles 114 and 115 of the Constitution, which provide that in the Republic of Moldova the justice is administered in the name of the law and only by courts, through the Supreme Court, Court of Appeal, tribunals and courts.
- ‘The provisions [...] of Article 46 (6) of Electoral Code also contravene the International rules recognised by the Republic of Moldova. Thus, Articles 14 (1) and (3)c) of the International Covenant on Civic and Political Rights provide that ‘All persons shall be equal before the courts and tribunals. In the determination of any criminal charge against him [...] everyone shall be entitled to a fair and public hearing’ without undue delay. Therefore, the rules contested in the notification infringe the right [...] of the electoral contender to a public hearing without delay for his criminal offences.’

⁴ [Decision](#) No 43 of 27.07.1999 of the Constitutional Court.

- 'Detention, arrest, criminal or administrative liability of particular people, in compliance with the legislation in force, do not contradict the constitutional rules concerning the free elections, freedom to vote and effective assurance of the constituents' will in choosing their representatives.'

However, in 2005 the electoral contenders' guarantees not to be held criminally accountable, arrested or subjected to administrative penalties were reintroduced in the Electoral Code⁵. The legislator's reasons for reintroducing these guarantees without the Supreme Court having reviewed the respective decision or changed its case-law are not clear. The fact is, provided that there is a precedent for declaring unconstitutional a legal rule bearing the same meaning as the newly established rule, it is very likely that in case of a repeated referral of the Supreme Court, the current rule will be declared unconstitutional too.

On 13 May 2021, the attorneys of a potential candidate for an MP position – Ilan Sor – asked CEC whether this candidate could/could not be registered from the PPS and if the preventive measure established by a conclusion of the court of July 2019 could be imposed to him. Subsequently, on 20 May 2021, CEC communicated about the preventive measure that the 'guarantees set up in Article 51 (4) of Electoral Code do not reflect on already applied procedural coercive measures, or for concluding ongoing criminal prosecutions, the approval of the electoral body is not necessary'⁶.

At the same time, on the day when the electoral contender from PACE was registered, media published a piece of news⁷ according to which the Prosecutor's Office of Sangerei District cited a potential candidate for the MP's position from this party to be accused and informed about the conclusion of the prosecution with further referral of the case to court. According to the representative of the Prosecutor's Office, the candidate declined to appear on the ground that he registered in the electoral race as a candidate for an MP position, and, according to Article 51 of Electoral Code, he requested the suspension of all procedural activities against him by the end of the elections. In its turn, the Prosecutor's Office of Sangerei requested CEC's approval to hold him criminally accountable, apply preventive measures and refer the criminal case to court. On 20 May 2021, CEC decided that for the conclusion of this prosecution its approval was not necessary, given that the procedural activities were realized until the registration of PACE and the list of candidates with CEC.

Considering that the rule with a form and content similar to the provision of Article 51, (4) of Electoral Code was previously declared unconstitutional, **we believe that it cannot and shall not be applied by the authorities, and the electoral contenders cannot rely on these guarantees.**

In support of that view, we note that the Supreme Court decided on 10.10.2013⁸ that 'the decision which claims the unconstitutionality of certain rules/acts not only has the force of the law, but it is also compulsory, via the recitals on which it relies, for all the constitutional organs of the Republic of Moldova, so that new rules/acts with the same content cannot be adopted again.'

In addition, we recommend the legislative authority, regarding the precedents for adopting new rules with content similar to the rules previously declared unconstitutional, to examine this practice, after the legal constitution of the Parliament, and if needed, to establish legal or constitutional rules meant to prevent this phenomenon.

1.3. Comments on the camouflage of electoral blocs or indirect support of the electoral contender

According to the Electoral Code, the notion of electoral bloc supposes a voluntary affiliation of two or more parties, created for the joint participation in elections which is registered by the Central Electoral Commission during Parliamentary Elections. In its Decision No 29 of 9 December 2014, the

⁵ [Law](#) No 176 of 22.07.2005 on Amendments and Addenda to the Electoral Code.

⁶ [Letter](#) No CEC-8/3952 of 20 May 2021.

⁷ [News](#) 'Prosecutor's Office of Sangerei concluded the prosecution under the case 'verde de brilliant' [brilliant green]. Cavaliuc, cited to be accused.' Source: www.newsmaker.md

⁸ [Decision](#) No 33 of 10.10.2013 of the Constitutional Court on Interpreting Article 140 of the Constitution.

Constitutional Court mentioned that ‘in order to ensure equal conditions for all electoral contenders in the following elections, the competent electoral authorities need to exclude from the beginning the situations of camouflage of electoral blocs into a sole political party.’ The Constitutional Court referred to the list of candidates for the MP position for the Parliamentary Elections of 30 December 2014 submitted by PSRM in which Vladimir Turcan was included with the express note President of the Political Party ‘Moldova Unita’⁹.

We note that an electoral bloc has more benefits against a political party, which is highlighted by the different representation threshold that must be achieved by every type of political formation. Thus, the candidates from the list of an electoral bloc benefit from the support of several political parties, especially:

- territorial organisations and structures of every political party within the electoral bloc;
- human resources – members and supporters of every party within the bloc;
- material and non-material resources of every party within the bloc;
- information resources and image of political parties within the bloc, which were created in time.

Thus, according to Article 75 (5)(a) of Electoral Code, using funds of a political party, which is not registered in the electoral race, and failing to declare this funds as donations may lead to diminishing the transparency of the election campaign funding, as well as to the de-registration of the respective electoral contender. In addition, the camouflage of electoral blocs into one political party also affects the equality of opportunity for the other electoral contenders who observe the law.

In this context, we remind the precedent during the Presidential Elections of 2016 when the PAS candidate, Maia Sandu, was supported by PPPDA after the withdrawal of he candidate Andrei Nastase¹⁰; the case of the new Parliamentary Elections for Hancesti constituency of 15 March 2020, when the independent candidate Grigore Cobzac was supported by PUN and PPPDA¹¹. Meanwhile, we mention another case of reduces transparency of the election campaign funding – during 2020 Presidential Elections, when the independent candidate Igor Dodon was supported by PSRM¹².

Taking into account the above mentioned, we draw the attention of potential electoral contenders to avoiding practices of camouflage of electoral blocs in one party or of support of independent candidates by political parties.

1.4. Allocation of funds for the organisation of early parliamentary elections

On 12 May 2021, after receiving and reviewing the expenditure estimate for the organisation and conduct of elections, the Government of the Republic of Moldova approved the Decision on the ‘Allocation of funds’¹³ By its means, the Ministry of Finance shall allocate to the Central Electoral Commission funds amounting to MDL 70 000,0 thousand for the organisation and conduct of early Parliamentary Elections of 11 July 2021 from the Government’s reserve fund, which is only 56% of the CEC expenditure estimate.

At the same time, according to item 2 of this Decision, the Government recommends CEC to review the expenditure estimate approved by CEC Decision No 4816/2021 in order to diminish it. Subsequently, on 19 May 2021, the Government sent a letter¹⁴ to CEC mentioning that the Government is ready to allocate the Commission the necessary additional funds starting from 20 June 2021 after an exhaustive identification of all expenditure that could not be fully estimated at the planning stage.

⁹ [Decision of the Constitutional Court](#) No 29 of 09.12.2014 confirming the results of the elections for the Parliament of the Republic of Moldova of 30 November 2014 and validating the mandates of elected MPs.

¹⁰ [Report No 4](#). Promo-LEX Observation Mission of the Presidential Election in the Republic of Moldova of 30 October 2016, p. 9

¹¹ [Final Report](#) of Promo-LEX OM of the Parliamentary Elections observation of 15 March 2020.

¹² [Report](#) No 4. Promo-LEX election observation mission for the position of President of the Republic of Moldova of 1 November 2020, page 12-13.

¹³ [The Government Decision](#) No 57 of 12.05.2021 on the ‘Allocation of funds’.

¹⁴ [Letter](#) No 20-76-627-3709 of 19 May 2021.

Thus, by 25.05.2021 neither the Commission approved a decision in the review of the expenditure estimate for the organisation and conduct of elections, nor the Government assumed by a regulatory act to allocate in the near future the necessary funds. The call of the interim prime-minister of the Republic of Moldova regarding a potential voluntary involvement of some members of stations created abroad also does not ensure sufficient funds for the conduct of the elections¹⁵.

In this regard, Promo-LEX OM expresses its concern about the lack of reliability and predictability in respect to the date of allocation of additional funds and sufficient coverage of expenditure for the organisation and conduct of elections. We are convinced that this situation may affect the good organisation and conduct of electoral procedures.

¹⁵ [The Ministry of Foreign Affairs](#) proposes the members of Diaspora to be volunteers in early Parliamentary Elections.

II. ELECTORAL BODIES

During the reference period, CEC has met in a mixed format (on-line and physical presence) in six sessions. 63 decisions have been approved for the organisation of the early Parliamentary Elections. In this context, one regulation has been approved, and two regulations have been adjusted to the legal rules specific to the proportional system. Promo-LEX welcomes that CEC approved the Regulation on reflecting the election campaign, which includes provisions that prohibit the incitement to hatred or discrimination during electoral debates, as well as broadcasting electoral spots and reports likely to disseminate, incite, promote or justify racial hatred, xenophobia, antisemitism or other forms of hatred. We also mention the amendment of the Regulation on the DEC activity, that enables the conduct of on-line sessions of the electoral body. To this end, Promo-LEX prioritizes the access of observers to the on-line sessions.

Concurrently, according to Promo-LEX, at least another five CEC regulations need to be adjusted to the provisions of the Electoral Code. By 25 May 2021, the Commission accredited 77 observers, of which 68 national observers (Promo-LEX) and 9 international observers.

CEC established 38 level-two electoral constituencies and 37 councils (DEC) within the legal deadlines. For the electoral constituency No 3 of Bender no DEC was established. Parliamentary parties appointed members in all the DECs. The staff of councils has no gender balance: 67% – women and 33% – men. At least two more DECs registered changes in their staff.

At least one case is registered that can be viewed as conducting opinion polls without prior notification of CEC.

After the conclusion of the preliminary registration procedure, Promo-LEX OM calculated the distribution of polling stations abroad. The information from the Presidential elections served as statistical data concerning the number of citizens living abroad, given that current data sent by MFAEI to CEC and available to observers were incomplete and could not be considered.

We draw attention to the increased number of preliminary registrations by 40 000 in comparison with the Presidential Elections of November 2020. According to Promo-LEX, during the last two weeks of registration at least eight villages changed the number of polling stations.

Concerning the distribution of polling stations by countries, Promo-LEX estimates that, if we take as a calculation basis 150 PSs budgeted by CEC, most stations shall be established in Italy (28), Russian Federation (21), Germany (13), United Kingdom (11), France (9) and Romania (9).

Meanwhile, if taking as a calculation basis 191 PSs proposed by MFAEI, most PSs shall be established in Italy (37), Russian Federation (29), Germany (17), United Kingdom (16), France (12) and Romania (11).

2.1. CEC Decisions

Thematic content of the decisions approved by the CEC. During the reporting period, CEC convened in six sessions, two of which were ordinary and four extraordinary, conducted in a mixed format. A series of activities necessary for the observance of the schedule for organising and conducting early Parliamentary Elections of 11 July 2021 were realized, and, in this regard, 63 decisions were adopted, as follows: 37 decisions by means of which level-two DECs were established; 4 decisions for the accreditation of national and international observers and 22 decisions concerning other actions covered by the achievement of the CEC schedule on organising the elections.

Transparency of the decision-making. According to Article 14(1) of the Law No 239/2008, in case of documents to be adopted by CEC during the electoral period, draft decisions may be developed and adopted without observance of stages provided by this law. However, we point out that according to the same article (par. (2)), the authority is obliged to publish the reasons for adopting a decision as a

matter of urgency without public consultation. For example, according to the practice of 2020 Presidential Elections^{16,17} According to data available on CEC website, section *Transparency in decision-making*, until the report was published, the authority did not post any comment on the adoption of decisions as a matter of urgency without consultation of stakeholders.

2.2. Accreditation of national and international observers

In view of monitoring early Parliamentary Elections of 11 July 2021, during the reporting period, CEC approved four decisions accrediting 68 national observers from Promo-LEX Association. CEC also accredited 9 international observers: 2 people from the Czech Republic Embassy in the Republic of Moldova, 3 people from the Hungary Embassy in the Republic of Moldova and 4 people from OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR). By 25 May 2021, a number of 77 observers, of which 68 national observers (Promo-LEX) and 9 international observers were accredited.

2.3. Regulations approved by CEC during the observation period

On 12 May 2021, CEC approved the Regulation on the Coverage of the election campaign during early Parliamentary Elections of 11 July 2021 in the Republic of Moldova. Promo-LEX welcomes that CEC included in the Regulation provisions that prohibit the incitement to hatred or discrimination during electoral debates, as well as broadcasting electoral spots and reports likely to disseminate, incite, promote or justify racial hatred, xenophobia, antisemitism or other forms of hatred based on intolerance or discrimination based on gender, race, nationality, religion, disability or sexual orientation.

Meanwhile, in order to adapt the procedures to the proportional system and pandemic conditions, during the reporting period two regulations were amended: Regulation on the activity of the polling stations precinct electoral bureaus¹⁸ and the Regulation on the activity of the district electoral council¹⁹.

We point out that one of the rules adjusted refers to the establishment of distinct electoral councils for the polling stations abroad and for the polling stations from the left bank of the Nistru river. The Regulation on the Voting procedure of the citizens of the Republic of Moldova living abroad²⁰ and the Regulation on the particularities of establishing and operating polling stations for the voters in ATU on the left bank of the Nistru river²¹ include more detailed rules on the establishment of the polling stations for these categories of voters, including in respect of the respective electoral councils. However, by 25 May 2021 these regulations were not adjusted to the amendments of the Electoral Code operated in 2019 on aspects regarding the proportional system for Parliamentary Elections. Moreover, the Regulation on the Voting procedure of citizens of the Republic of Moldova living abroad was not adjusted to the provisions of the Electoral Code regarding the duties of competent authorities to organise the polling stations abroad – Article 31(3) of Electoral Code.

We point out that other CEC regulations that need to be adjusted to the specificity of the parliamentary elections in a proportional system are:

- Regulation on the activity of trustees of electoral contenders;
- Regulation on the drawing lots;
- Regulation on the preliminary registration;
- Regulation on the development, administration, dissemination and updating of electoral rolls;
- Regulation on the political advertising method and political promotion on billboards.

¹⁶ [Comment](#) on the amendment of the Regulation on the Activity of PEB of 26 August 2020.

¹⁷ [Comment](#) on the amendment of the Regulation on the Activity of DEC of 26 August 2020.

¹⁸ [CEC Regulation](#) on the Activity of polling stations precinct electoral bureaus of 19 May 2021.

¹⁹ [CEC Regulation](#) on the Activity of the district electoral council of 19 May 2021.

²⁰ [Regulation](#) on the Voting procedure of citizens of the Republic of Moldova living abroad.

²¹ [Regulation](#) on the particularities of establishing and operating polling stations for the voters in Administrative Territorial Units on the left bank of the Nistru river, Bender Municipality and some localities of the Causeni district.

At the same time, item 32¹ of the Regulation on the activity of the district electoral council provides that 'In cases when the state of emergency or public health emergency is established on the territory of the Republic of Moldova, as well as when motivated situations impede the physical presence of members in the office where the sessions of the electoral council are held, at the members' request, their participation in the electoral council's sessions may be organised by means of information technologies and communication and/or via on-line video-conference platforms. (...) The provisions of this rule are not applied to the sessions organised the election day and the day before'. The same rule was included in the Regulation on the activity of the polling stations precinct electoral bureaus.

We point out that the conduct of DEC/PEB sessions by means of information technologies and communication and/or via on-line video-conference platforms shall not affect the rights of other parts of the electoral process. We refer, especially, to the right of the representatives of electoral contenders in electoral bodies, national and international observers and media representatives to attend all sessions of electoral bodies according to Articles 15, 60(8), 68(5), 70(1) of Electoral Code.

Thus, we recommend the electoral bodies to ensure free participation of all stakeholders of the electoral process (for example, by publishing technical details concerning the connection to the respective session) if they decide to conduct the session via on-line platforms.

Other amendments of the Regulation on the activity of the polling stations precinct electoral bureaus include the supplementing with legal rules for regulating the situation when CEC performs also the duties of PEB, the presence of members in sessions.

2.4. Circular letters

On 21 May 2021, CEC developed and sent to district councils, level-two DEC's and to the National Inspectorate of Public Security the *Circular Letter No CEC-8/3966*²² informing the consignees about the need to observe the provisions targeting the electioneering, especially those related to the establishment of the minimum of places for electoral displays and the minimum of premises for the meetings with voters. The document highlights five issues:

- the deadline for establishing the minimum of places for electoral displays and the minimum number of premises for conducting meetings with voters (8 May 2021);
- public awareness about the respective decisions/provisions;
- ensuring a level playing field for all electoral contenders in order to access places for electoral display, as well as premises for meetings with voters.
- observance of protection measures against COVID-19, including social/physical distance;
- ascertainment and removal of unauthorized electoral display.

2.5. Constitution of level-two electoral constituencies

According to the legal provisions²³, CEC creates, at least 55 days before the elections, electoral constituencies, which usually match the level-two administrative-territorial units of the Republic of Moldova. According to the CEC schedule, the deadline for constituting an EC was 16 May 2021.

On 13 May 2021, by the Decision No 4836²⁴, CEC formed 38 level-two electoral constituencies, including electoral constituency No 3 Bender, electoral constituency No 37 for the localities on the left bank of the Nistru river, and electoral constituency No 38 for the polling stations abroad. The deadline for their establishment was met.

We point out that according to the above mentioned decision, the electoral constituencies for the localities on the left bank of the Nistru river and for the polling stations established abroad are equal to electoral constituencies in level-two administrative-territorial units.

²² [Circular letter](#) No CEC-8/3966 of 21 May 2021.

²³ Article 80(1) of Electoral Code – Constitution of electoral constituencies and district electoral councils.

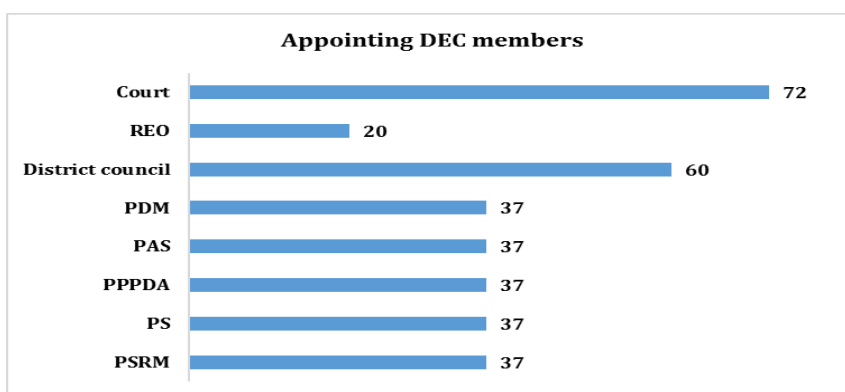
²⁴ [CEC Decision No 4836](#) on the Establishment of level-two electoral constituencies for the conduct of early Parliamentary Elections of 11 July 2021.

2.6. Constitution of level-two district electoral councils (DEC)

On 21 May 2021, CEC Decisions No 4861-4897 established 37 electoral councils according to item 8 of the Schedule and the Electoral Code. Note that DEC Bender was not established for this parliamentary election either, held on the basis of proportional electoral system²⁵. In this context, we mention that for the early Parliamentary Elections, based on the proportional electoral system, DEC No 37 was established, for the first time, for localities on the left bank of the Nistru river.

Thirty-five level-two electoral councils have 9 members, while DEC No 1 of Chisinau Municipality and DEC No 38 for the polling stations established abroad have 11 members. The appointment of members in the electoral body by the entitled entities is shown in the Chart 1.

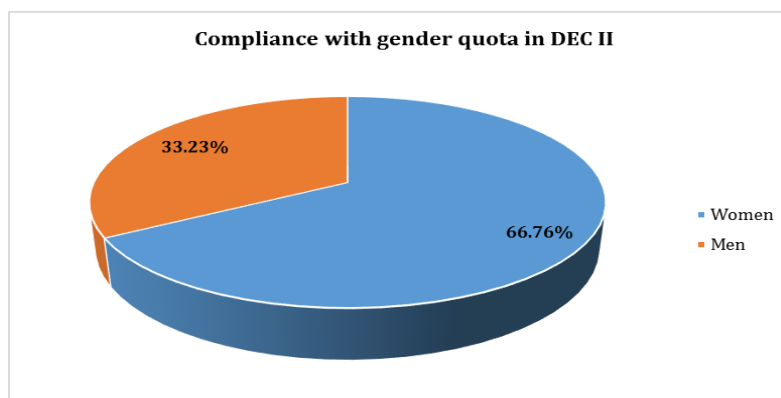
Chart 1.



We point out that, according to the legal provisions, in the case of parliamentary elections, two candidates of DEC II are proposed by the court or, as the case may be, by the court of appeal, two other candidates - by the second level local councils and the People's Assembly of Gagauzia. Other candidates are proposed by the parties represented in the Parliament at the date when the electoral district councils are established²⁶. Therefore, we find seven cases²⁷ when no member was appointed by the district councils and one case (DEC No 38 for the polling stations abroad) when no member was appointed by the court. In this context, we mention that the parties represented in the Parliament appointed members in each of the constituted district electoral councils.

The analysed CEC Decisions approving the nominal composition of DEC II in this election also show an increased engagement of women in comparison with men (see Chart 2). As compared with the Presidential Elections of November 2020, for the early Parliamentary Elections of July 2021 the share of women in the composition of DEC II increased by 2.66%.

Chart 2.



²⁵ [Final Report](#). Promo-LEX parliamentary election Observation Mission of 30 November 2014, p. 8.

²⁶ Article 28 of Electoral Code.

²⁷ DEC No 1 Chisinau municipality, No 15 Dubasari, No 17 Falesti, No 33 Taraclia, No 36 ATU Gagauzia, No 37 for the localities on the left bank of the Nistru river and No 38 for the polling stations established abroad.

Table 1 indicates the district electoral councils with the greatest gender imbalance.

Table 1 Examples of gender imbalance within DEC II

DEC II	Men/women ratio
No 32 Stefan Voda	0 / 9
No 8 Cantemir, No 12 Criuleni, No 17 Falesti, No 31 Soldanesti	1 / 8
No 38 for polling stations established abroad	1 / 10
No 10 Causeni, No 29 Sorooca, No 30 Straseni, No 36 ATUG	2 / 7
No 4 Anenii Noi, No 7 Cahul, No 9 Calarasi, No 13 Drochia, No 16 Edinet, No 20 Hancesti, No 21 Ialoveni, No 22 Leova, No 24 Ocnita, No 25 Orhei, No 28 Sangerei, No 37 for communities on the left bank of the Nistru river	3:6/6:3

By Letters No CEC-8/3878, CEC-8/3879 and CEC-8/3880²⁸, the electoral authority recommended that level-two local councils, People's Assembly of Gagauzia, political parties represented in the Parliament and courts nominate candidates who had been trained and certified by CICDE, are aged 63+ and do not belong to COVID-19 risk groups.

The change in the composition of DEC. Promo-LEX OM finds at least two level-two DEC (No 15 Dubasari and No 27 Rascani) that have changed their composition. These changes were due to the requests for resignation of DEC members appointed by PPPDA and REO. After analysing the CEC Decisions on changing the nominal composition of DEC II, we find that the CEC gender quota is the same.

2.7. Informing CEC about conducting opinion polls

According to Article 70(10) of Electoral Code, during electoral period, opinion polls concerning the voters' political preferences may be conducted only by prior notification of CEC. The information will include data about the institution that will conduct the opinion poll, its timeframe, the sample proposed and the limited partner of this poll. The results of these opinion polls may be published not later than 5 days before the election day.

According to data on the CEC website, section *Notifications for conducting opinion polls*, the Association of Sociologists and Demographers of Moldova²⁹, CBS -AXA Center of Sociological Investigations and Marketing Research³⁰ and SRL IMAS – Research and Strategies³¹ submitted information requests to electoral authorities. Promo-LEX OM establishes that the requests of two research institutions do not include information about the proposed sample (CBS -AXA Center of Sociological Investigations and Marketing Research) and information about the limited partner of the opinion poll (IMAS Company).

At the same time, during the reference period, Promo-LEX OM found at least one opinion poll about voters' political preferences that did not comply with the stated conditions. Thus, within sondaje.md project, the Association WatchDog.md Community conducted an opinion poll among internet users from the Republic of Moldova about the political preferences during the parliamentary elections³². We note that the survey will be available until the end of May. Concurrently, the authors of the project specify that this type of surveys is not sociologically important, but it reflects quite closely the opinions of the active internet users across the country.

²⁸Letters [CEC-8/3878](#) [CEC-8/3879](#) and [CEC-8/3880](#) of 30 April 2021.

²⁹ [Notification](#) of the Association of Sociologists and Demographers of Moldova about the conduct of three sociological studies for the adult population of the country.

³⁰ [Notification](#) of the 'CBS -AXA Center of Sociological Investigations and Marketing Research' about the conduct of a number of pre-election opinion polls, as well as a telephone survey on the election day.

³¹ [Notification](#) of SRL IMAS – Research and Strategies about conducting five socio-political surveys.

³² <https://sondaje.md/>

2.8. Activities concerning the organisation of elections for the citizens of the Republic of Moldova from the transnistrian region

According to article 32 of Electoral Code, as well as to the provisions of CEC Regulation³³ on the Voting procedure of citizens of the Republic of Moldova from the transnistrian region, for the parliamentary elections, different polling stations shall be constituted on the territory under authorities' constitutional control.

We remind that previously, during Parliamentary Elections of February 2019, 47 PSs out of the total number of 2 143 PSs were opened, and for the Presidential Election of November 2020 – 42 PSs out of the same total number of 2 143 PSs constituted across the country.

In view of constituting and organising polling stations for the citizens residing on the left bank of the Nistru river, the electoral authority has undertaken the following measures:

- By Letter No [CEC-8/3899](#)³⁴ of 5 May 2021, addressed to the Joint Control Commission (JCC), Bureau for Reintegration Policies (BRP) under the State Chancellery and to the General Police Inspectorate, the electoral authority requested that each institution appoints one representative to participate in developing the Work Plan related to the organisation and conduct of parliamentary elections for the voters of the left bank of the Nistru river (Transnistria), Bender municipality and some localities of Causeni district.
- By Letter No [CEC-8/3900](#)³⁵ of 5 May 2021, the Commission requested that level-one public authorities:
 1. *evaluate the public venues under their management so that they comply with the requirements of accessibility, equality, transparency, efficiency and officiality of the voting process;*
 2. *inform CEC about the polling station venue and its area by 2 June 2021;*
 3. *arrange the venue of the polling station according to the requirements of accessibility for people with special needs, as well as observance of social distance of 1 (one) meter between the electoral officials;*
 4. *regularly update the data included in the State Voter Register.*

At the same time, the electoral authority communicated to the LPA that if the area of the venues reserved for the polling stations does not comply to the parameters, the authorities shall identify other premises to open the polling stations.

- By Letter No [CEC-8/3906](#)³⁶ of 7 May 2021, CEC required the District Chairmen to submit the information about communication channels between both banks of the Nistru river.
- By Letter No [CEC-8/3937](#)³⁷ of 17 May 2021, the electoral authority requested that the Bureau for Reintegration Policies (BRP) under the State Chancellery:
 1. *submit proposals for the establishment of different polling stations for the voters from the left bank of the Nistru river (Transnistria);*
 2. *express their opinion about the communities where polling stations for the Presidential Elections were set up.*

In its response of 21 May 2021³⁸, the BRP informed the Commission about the no objections concerning the list³⁹ approved by CEC for the Presidential Election of November 2020 and about certain risks related to setting up PSs for the voters from the left bank of the Nistru river. In addition, based on a positive experience of interaction of BRP and the Moldovan delegation in JCC with the

³³ [Regulation](#) on the particularities of establishing and operating polling stations for the voters in Administrative Territorial Units on the left bank of the Nistru river (Transnistria), Bender Municipality and some localities of the Causeni district, approved by CEC Decision No 1567 of 24 April 2018.

³⁴ [CEC letter](#) No 8/3899 of 5 May

³⁵ [CEC letter](#) No 8/3900 of 5 May

³⁶ [CEC Letter](#) No 8/3906 of 7 May.

³⁷ [CEC Letter](#) No 8/3906 of 7 May.

³⁸ [BRP Letter](#) No 23-78-378-3792 of 21 May 2021.

³⁹ [CEC Decision](#) No 4301 of 26 September 2020 on the Organisation of PSs for the voters from communities on the left bank of the Nistru river, Bender Municipality and some communities of Causeni district during Presidential Election of the Republic of Moldova of 1 November 2020.

OSCE Mission in Moldova, the Bureau communicated about its intention to call for the Mission's assistance for a better development of the elections of 11 July 2021.

2.9. Relevant activities for the constitution of polling stations abroad

The deadline for setting up the PSs – including abroad – is 5 June 2021. We reiterate that, according to the legal framework⁴⁰, the polling stations constituted abroad under the diplomatic missions and consular posts shall be accompanied by polling stations in other communities where Moldovan citizens are registered, and the decision on their number and geographic location, adopted based on the prior notification of MFAEI, relies on three criteria equally important:

- number of voters who participated in the previous election, conducted under the national constituency (available on CEC official website);
- number of preliminary registrations of Moldovan citizens abroad (available on www.alegator.md);
- information held by MFAEI on the number of Moldovan citizens abroad and their location.

Prior notification of MFAEI shall refer to the achievement of the requirement concerning the approval of the competent authorities in the respective countries, as well as the possibility to ensure the voting process from logistical point of view.

Updating the data held by MFAEI concerning the number of Moldovan citizens abroad During the monitored period, on 17 May 2021⁴¹, MFAEI informed CEC about the request for information about:

- the number of citizens abroad, as well as their geographic distribution from the diplomatic missions and consular posts of the Republic of Moldova;
- prior agreement of the states of residence to set up PSs on their territory.

Until the report was published, neither CEC, nor MFAEI published information about the final data on the number of citizens living abroad and the prior agreement of the states of residence to set up PSs on their territory. However, during a joint press conference organised by MFAEI and CEC on 25 May 2021⁴², it was mentioned that the number of PSs established abroad in the context of Parliamentary Elections of 11 July 2021 may not be smaller than during the previous elections (for the Presidential Elections of 2021, 139 PSs were established). Moreover, a number of 190 PSs was announced publicly⁴³.

In this context, given the provisions of Article 68(5) of Electoral Code on the Right of observers to have access to all electoral information, Promo-LEX OM requested and received from CEC the MFAEI Letter of 25 May 2021 including the proposals of the embassies concerning the opening of 191 PSs outside the Republic of Moldova. The Letter also includes data on the number of citizens abroad per countries. We note that the information submitted by MFAEI is incomplete, the annexes covering only 19 states, including only about 109 PSs. Statistical data about other states are missing. Additionally, we point out that the information about the number of Moldovan citizens living in certain countries is mostly different, which makes it hard to calculate the number of polling stations. For example, in the case of Ireland, according to official sources (data submitted by the competent authorities of the states of residence) there would be about 2000 citizens, while during the Presidential Elections over 11 000 voters have participated, and MFAEI estimates a number of about 20 000 citizens.

⁴⁰ Article 31 of Electoral Code.

⁴¹ [MFAEI Letter](#) No DC/3/402/4588 of 17 May 2021 addressed to CEC.

⁴² [Joint Press Conference](#) of MFAEI and CEC concerning the 'early Parliamentary Elections – the organisation process regarding the voting procedure abroad'.

⁴³ [Program](#) 'Moldova in direct' of 25 May 2021.

Therefore, provided the incomplete and sometimes different information, Promo-LEX OM could not use the data submitted by MFAEI to CEC to estimate the distribution of polling stations. Meanwhile, in order to highlight the role and the impact of the preliminary registration during the last two weeks of the implementation of the procedure, we think it is methodologically correct to use the same data on the number of citizens abroad (submitted in August 2020) that we have used in the Report No 1.

Development of the preliminary registration process. According to the current opinion of CEC, all prior declarations submitted by April 2018 are valid provided that the voter has not submitted other related requests (cancellation or change of the declaration). In the Promo-LEX opinion, which was also expressed in the context of Presidential Elections of 2020⁴⁴, the current position of the electoral authority may undermine the impartiality and reliability of preliminary registration data. We note that, according to item 2 of the Regulation on the preliminary registration, the preliminary registration is a procedure allowing the Moldovan citizens with the right to vote who will be abroad on the election day (...) to voluntarily pre-register. Subsequently, preliminary registrations are unique given that voters register only because they will be in the indicated location on the election day. Moreover, their voluntary registration supposes also a desire to participate to voting. Therefore, we believe that taking into account a preliminary registration made for another election could distort the number of voters and, respectively, of the ballots necessary for the respective station.

Thus, we reiterate the position of Promo-LEX concerning the need to review the Regulation on the preliminary registration in view of regulating the following five aspects concerning the submission of declarations (both on-line and on paper): the validity term for a preliminary statement; mechanisms for informing voters about the validity of preliminary registrations for several elections; repeatedly informing voters before the election, about the validity of statements that were submitted preliminarily prior to every election, including the possibility of their cancellation.

In the context of Parliamentary Elections of 11 July 2021, CEC informed by a press release of 22 February 2021 about the possibility of preliminary registration. The deadline for the preliminary registration of voters who will be abroad on the election day has been 26 May 2021. After the end of the process, it was found that, in comparison with the Presidential Elections of 2020, the number of preliminary registrations increased by 40 000 registrations. Thus, if for the Parliamentary Elections of 2019, 24 021 preliminary registration requests were submitted, in the context of the Presidential Elections of 2020 – 60 035 preliminary registrations, then for the Parliamentary Elections of 2021 their number increased to 100 052 registrations.

Based on what was mentioned earlier, we find that due to the current CEC position aiming to consider valid all the preliminary registration declarations submitted in 2018, it is not possible to identify the total number of preliminary registrations strictly made for the Parliamentary Elections of 2021: new, updated, cancelled or unchanged preliminary registration declarations.

The Table 2 reflects the top 10 states registering the largest increase in the number of registrations, compared with 2020, with Italy on first place, followed by Germany, United Kingdom and France.

Table 2. Top 10 states with the largest increase in the number of preliminary registrations

No	State	Preliminary registrations 2020	Preliminary registrations 2021	Increase	Share (2020/2021)
1	Italy	12067	21804	9737	1.81
2	Germany	6423	14148	7725	2.20
3	UK	9478	16188	6710	1.71
4	France	5029	8930	3901	1.78
5	Ireland	3167	5178	2011	1.63
6	Spain	1634	3050	1416	1.87
7	Romania	5347	6684	1337	1.25

⁴⁴ [Report No 1](#), Election observation mission for the position of President of the Republic of Moldova of 1 November 2020, page 21-23.

8	Russian Federation	6202	7308	1106	1.18
9	USA	2656	3720	1064	1.40
10	Portugal	648	1569	921	2.42

Promo-LEX estimates on the establishment of PSs abroad. After the conclusion of the preliminary registration procedure, Promo-LEX estimated the number of PSs that need to be established abroad. Both the number of 150 PSs (planned by CEC) and the MFAEI proposal to set up 191 PSs abroad served as a calculation basis.⁴⁵ The Promo-LEX estimates (see Table 3) were made on the basis of the three criteria provided in the Electoral Code, each criterion being assigned an equal weight, as well as the CEC methodology on establishment of PSs abroad during Presidential Elections of 2020⁴⁶.

Thus, we find that given the calculation basis of 150 PSs budgeted by CEC, most of the PSs shall be constituted in Italy (28), Russian Federation (21), Germany (13), United Kingdom (11), France (9) and Romania (9). Concurrently, given the absence of diplomatic missions/consular posts in Denmark and Norway, as well as the minor share of the three criteria established by the legal framework, the establishment of PSs in the states mentioned becomes difficult and onerous.

Meanwhile, if taking as a calculation basis the 191 PSs proposed by MFAEI, most PSs shall be established in Italy (37), Russian Federation (29), Germany (17), United Kingdom (16), France (12) and Romania (11). Establishing PSs in Norway may still be difficult and costly (due to the absence of diplomatic missions/consular posts, as well as of the minor share of the three criteria established by the legal framework).

Table 3. Promo-LEX estimates about the establishment of PS abroad

No	State	No of voters who participated in 2020 elections (R II)	MFAEI (August 2020)	Preliminary registrations (11.05.21)	Preliminary registrations (27.05.21)	Promo-LEX Estimates		
						Based on preliminary registrations of 11.05.2021	Based on preliminary registrations of 27.05.2021	Based on the 191 PSs proposed by MFAEI (PM of 27.05.2021)
1	Austria	1510	1409	297	390	1	1	2
2	Azerbaijan	53	119	9	11	1	1	1
3	Belarus	216	2974	15	22	1	1	1
4	Belgium	6506	7000	1226	1687	3	3	3
5	Bulgaria	239	5000	28	40	1	1	1
6	Canada	5051	50000	1750	2179	5	5	6
7	Czech Republic	3108	5903	549	751	2	2	2
8	China	19	178	17	18	1	1	1
9	Cyprus	577	10000	127	170	1	1	1
10	Denmark	911	1194	670	793	1		1
11	Switzerland	1593	529	568	773	2	2	2
12	United Arab Emirates	176	1410	118	140	1	1	1
13	Estonia	226	400	47	59	1	1	1
14	Russian Federation	14068	356731	6360	7308	21	21	29
15	France	26939	17000	6070	8930	8	9	12
16	Germany	24080	20375	8775	14148	12	13	17
17	Greece	2313	7196	375	553	2	2	2
18	Ireland	11189	1987	3938	5178	5	4	6
19	Israel	4990	18000	534	724	3	3	3
20	Italy	83032	128979	14720	21804	27	28	37
21	Japan	30	188	14	16	1	1	1
22	Latvia	84	363	32	32	1	1	1
23	Lithuania	77	729	9	18	1	1	1
24	UK	26408	24000	11555	16188	11	11	16
25	Norway	598	260	253	330	1		
26	Poland	317	37338	148	182	3	2	3
27	Portugal	5847	5098	940	1569	2	3	3
28	Qatar	66	139	17	19	1	1	1
29	Romania	19530	19400	5749	6684	9	9	11
30	Spain	8272	18537	2212	3050	4	4	5

⁴⁵ Promo-LEX OM did not consider the geographical location of polling stations proposed by MFAEI in estimating their distribution.

⁴⁶ [CEC Decision No 4300](#) on the Constitution of polling stations abroad for the Presidential Elections of the Republic of Moldova of 1 November 2020.

31	USA	9838	47767	2914	3720	7	7	9
32	Sweden	368	248	171	210	1	1	1
33	Netherlands	2779	986	847	1063	2	2	2
34	Turkey	1408	7942	100	156	3	3	3
35	Ukraine	512	23800	65	81	3	3	4
36	Hungary	247	680	66	69	1	1	1
TOTAL		263 177	824 964	71 285	100 062	150	150	191

Besides identifying the number of PSs to be set up abroad, our goal was also to determine *the impact of preliminary registrations* on the number of PSs to be established in an individual country. Thus, in order to identify the impact of preliminary registrations on the decision about the PSs to be set up abroad, the Promo-LEX estimates based on preliminary registrations as of 11 May 2021⁴⁷ and the estimates based on preliminary registrations of 27 May 2021 were used.

Subsequently, it was found that the number of PSs should be different in at least in 8 states. Thus, setting up PSs in Denmark and Norway could be difficult, in Ireland and Poland by one less PS per country should be established, and in France, Germany, Italy and Portugal – by one more PS (see Table 3).

Promo-LEX OM reiterates that the estimate/simulation of the number of PSs that need to be established abroad was based on the information submitted by MFAEI about the number of Moldovan citizens living abroad in the context of 2020 Presidential Elections. Therefore, in case of major differences between the information about the number of citizens of the Republic of Moldova abroad in 2020 and the information that needs to be submitted by 5 June 2021, we believe that the result of the simulation/estimate will be different compared to the one in this report.

⁴⁷ Report No 1 of the Observation Mission of the early Parliamentary Elections of 11 July 2021.

III. CONTENDERS' APPOINTMENT AND REGISTRATION

By 26 May 2021, CEC has registered eight contenders (six parties and two electoral blocs), and two other applications are being examined. The gender quota within the candidates lists is observed. No application for registration has been rejected. Meanwhile, no independent candidate has been registered.

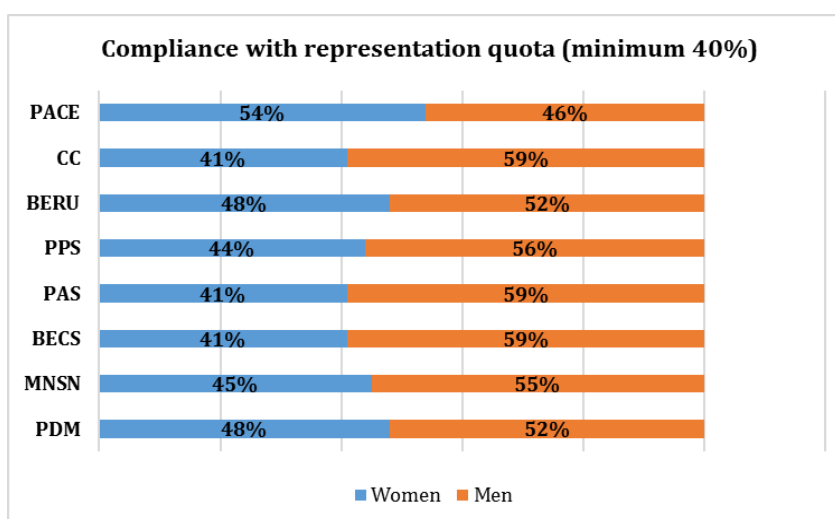
According to the CEC schedule, the deadline for appointing and submitting the applications for the candidates' registration (including supporters signature collection) is 12 May – 11 June 2021. Between 12 May – 26 May 2021, eight political formations (six parties and two electoral blocs) have been registered as electoral contenders. Two other formation submitted their applications, which are still being examined.

Table 4. Registration of electoral contenders (according to their order in the ballot paper)

No	Formation	Application date	Decision and date of the contender's registration
1	Political party Party We Build Europe Home 'PACE'	14.05.2021	CECD No 4855 of 21.05.2021
2	Political party 'Joint Actions Party - the Civic Congress'	14.05.2021	CECD No 4856 of 21.05.2021
3	Electoral bloc 'RENATO USATII'	14.05.2021	CECD No 4857 of 21.05.2021
4	'Sor' Political Party	14.05.2021	CECD No 4859 of 21.05.2021
5	Political party 'Action and Solidarity Party'	14.05.2021	CECD No 4858 of 21.05.2021
6	Electoral bloc of Communists and socialists	14.05.2021	CECD No 4854 of 21.05.2021
7	Professionals' movement 'Speranța - Надежда'	18.05.2021	CECD No 4908 of 25.05.2021
8	Democratic Party of Moldova	20.05.2021	CECD No 4921 of 26.05.2021
9	Platform named 'Demnitate si Adevar' (Dignity and Truth)	24.05.2021	
10	National Unity Party	26.05.2021	

In order to evaluate implementation of the provisions of Article 46(3) of Electoral Code⁴⁸, the lists of candidates of the eight electoral contenders registered were examined. Thus, according to the Chart 3, all the eight formations that submitted lists of candidates observed the minimum share of representation (40%) of each sex. We also mention that in all eight cases, the positions of candidates in the lists is set according to the legal provisions, *minimum four candidates for ten places*.

Chart 3



⁴⁸ The lists of candidates for the parliamentary and local elections shall be drawn up by observing the minimum share of representation of 40% of each sex. The formula for positioning the candidates in the lists is: minimum four candidates per ten places.

IV. PUBLIC ADMINISTRATION

Promo-LEX OM finds shortcomings in the achievement of LPAs' duties related to the assurance of a transparent and correct process. According to the observers, out of 43 visited LPAs, only 26 (about 60%) approved the decisions establishing the spaces for electoral display and places for meetings with voters. And only 13 (50%) out of these 26 LPAs displayed the respective decisions on their information board.

The Promo-LEX observers also noted at least one case when LPA's decisions concerning the establishment of locations for posters failed to meet the provisions of the CEC Regulation on the Method of political advertising. We refer to the establishment of places for posters on fences.

We find that the LPA's skills regarding the appointment of electoral bodies members in this election have also been ignored. Promo-LEX OM identified at least seven DEC II (19%) where none of the members was appointed by level-two LPAs.

4.1. Establishment of places for electoral posters and meetings with voters

According to the provisions of Electoral Code⁴⁹, first level LPAs are obliged, within 3 days from the date of the beginning of the election period, to establish and ensure a minimum number of special places for electoral posters and of premises for carrying out meetings with voters. The respective decisions (provisions) shall be promptly displayed at the offices of these authorities and communicated to stakeholders via mass-media and other available communication means.

According Promo-LEX OM, out of 43 LPAs visited during the observation period, only 26 (about 60%) approved the decisions establishing the spaces for electoral posters and places for meetings with voters. And only 13 (50%) out of these 26 LPAs displayed the decisions establishing the spaces for electoral posters and places for meetings with voters on the information board of the community. We mention that the monitoring of these aspects will continue during the Promo-LEX visits under the activity of the Mission, with updated data included in the next reports.

4.2. LPAs implementation of the legal provisions on the Method of political advertising and promotion on billboards

The Promo-LEX observers noted at least one case when LPA's decisions concerning the establishment of locations for posters failed to meet the provisions of the CEC Regulation on the Method of political advertising and promotion on billboards. Thus, by Order No 221-d of 7 May 2021 Establishing the special places for electoral posters, the Mayor of Chisinau municipality set as special place for electoral posters seven concrete fences and nine protection fences from Buiucani and Ciocana regions⁵⁰.

We point out that, according to the Regulation, it is prohibited to display posters in public transport; on historic, cultural or architectural monuments, buildings, objects and venues, regardless of the form of ownership; on trees; inside electoral councils and bureaus and at their entries; on public fences, enclosures, poles and other types of constructions, as well as on devices and machinery, regardless of the form of ownership⁵¹.

In this context, we underline that, according to item 20 of the Regulation, law enforcement bodies along with the local public administration are obliged to identify and remove electoral and/or political promotion posters displayed on billboards that are not meet the requirements set up in Article 52(3), (4) and (8) of Electoral Code.

⁴⁹ Article 52(9) of Electoral Code.

⁵⁰ [Order No 221-d of the Mayor](#) of Chisinau municipality establishing the special places for electoral posters of 7 May 2021.

⁵¹ Item 14 of the [CEC Regulation](#) on the Method of political advertising and promotion on billboards.

4.3. LPAs' duties in appointing the members of the electoral body

According to Article 28(5) of Electoral Code, in the case of parliamentary elections, the applications of two DEC II members are proposed by level-two local councils and the People's Assembly of Gagauzia.

Following the analysis of decisions on constituting DECs, Promo-LEX OM identified 7 electoral councils (19% out of 37) where none of the members was appointed by level-two local councils. Among these we mention: DEC No 1 Chisinau municipality, No 15 Dubasari, No 17 Falesti, No 33 Taraclia, No 36 ATU Gagauzia, No 37 for the communities on the left bank of the Nistru river and No 38 for the polling stations established abroad. We note that within all identified councils, the members were appointed from the Register of Electoral Officials (REO).

V. ELECTORAL CONTENDERS

Promo-LEX OM reminds that most of electoral contenders started their electioneering activities in absence of registered trustees.

Promo-LEX observers reported at least 18 cases (17 – BECS, 1 – AUR) of electioneering performed before the established legal deadline, which urges to vote for a particular/potential electoral contender.

For 21 – 25 May 2021, at least 46 cases of electoral activities performed by four electoral contenders were reported. PAS (80%), BECS (11%), BERU (7%) and PPS (2%). The most popular electoral promotion activities were the dissemination of electoral materials (63%) and meetings with voters (28%).

In the observation period, at least 121 cases viewed as use of administrative resources for electoral promotion purposes were identified. Of these, 120 cases concern the engagement of public employees in election campaign activities and one case – taking credit for services performed from public funds.

There were also at least three cases viewed as gifts with electoral impact (BECS –2, BERU – 1).

We also mention one case that may be viewed as engagement of the President of the Republic of Moldova in the campaign supporting an electoral contender – PAS.

5.1. Activities with electoral overtones carried out until the contenders' registration

In accordance with Article 52(4) of the Electoral Code, as well as with the CEC Schedule⁵², electioneering is allowed only after the registration of the electoral contender by the electoral body. It should be noted that, according to the law, *electioneering* is an activity of preparation and dissemination of information containing a call to vote in order to determine voters to vote for certain electoral contenders.

Despite the above, in the period between the first day of candidate nomination and the first day of registration of electoral contenders⁵³, the Promo-LEX observers reported at least 15 electoral activities carried out by candidates/potential candidates (applied for registration).

Table 5. Activities with electoral connotations carried out by candidates/potential candidates

Reported activities	BECS	BERU	PPS	PACE	PPPDA*	Total
Flashmob	1					1
Laying flowers					1	1
Dissemination of information materials	7		1	2	1	11
Financial/in-kind donations	1	1				2
Total	9	1	1	2	2	15

Most activities (73%) were related to the dissemination of information materials to citizens (party newspapers). Note that these activities were carried out during the electoral period.

In the same context, we found that at least 12 electoral activities were reported (see Table 6) carried out by 3 political parties – AUR, PDA and PUN – which stated publicly that they intend to participate as candidates in the parliamentary elections of 11 July 2021. Most of the activities were meetings with citizens.

⁵² [The CEC schedule](#) for organising and conducting the early Parliamentary Elections of 11 July 2021, Item 33.

⁵³ In the case of BECS, BERU, PPS and PACE the reference period is 12 – 21 May 2021, and for PPPDA the activities reflected in the table were carried out between 12 – 25 May 2021.

Table 6. Activities of the parties that did not apply for registration with the CEC, but announced their participation

<i>Conducted activities</i>	<i>AUR</i>	<i>PDA</i>	<i>PUN</i>	<i>Total</i>
Door-to-door activities		2		2
Financial/in-kind donations			1	1
Meetings with citizens	2	6		8
Protests/Flashmobs		1		1
Total	3	9	3	12

5.2. Electioneering conducted before the legal time-frame

During the observed period, at least 18 instances (17 – BECS, 1 – AUR) were reported of urging to vote for a certain electoral contender before the legal time-frame (that is after the registration of the electoral contender), as follows:

- 17 cases⁵⁴ for BECS. Thus, note that on 19⁵⁵ and 20⁵⁶ May 2021, on the official website of PSRM were published the initiatives in support of the establishment of BECS, signed by the mayors and councilors of about 64 LPAs. At least 17 of those support initiatives (signed before the date of BECS registration as an electoral contender) contained a call to vote for BECS.
- 1 instance in the case of AUR. On 20 May 2021, Boris Volosatii, citizen of the Republic of Moldova, MP in the Romanian Parliament (nominated by AUR Romania), made an appeal for voters to vote AUR Moldova.

In the same context, it should be noted that in the case of the two video spots⁵⁷ broadcast before the registration of PAS as an electoral contender, which were promoting the nominated candidates, calls to vote were made, but without being directly stated the name of the candidate to be voted for.

5.3. Promotion activities in the election campaign

Between 21 and 25 May, at least 46 electoral activities were reported by 4 electoral contenders (see Table 7). The most active was PAS (80%), followed by BECS (11%) and BERU (7%).

Table 7. Electoral activities of electoral contenders

<i>Activities</i>	<i>PAS</i>	<i>BECS</i>	<i>BERU</i>	<i>PPS</i>	<i>Total</i>
Door-to-door activities	3				3
Concerts			1		1
Dissemination of electoral materials	27	2			29
Electoral meetings	7	3	2	1	13
Total	37	5	3	1	46

The most popular activities used by the candidates for electoral promotion purposes were the dissemination of electoral materials (63%) and the electoral meetings (28%).

⁵⁴ LPAs Cantemir, Donduseni, Drochia, Floresti (2), Ocnita (3), Sangerei, Chipescsa, Gauzeni, Soroca (2), Falesti, Balti, Rezina, Soldanesti.

⁵⁵ [The PSRM communiqué](#): Local elected officials from the country's districts welcome the creation of the electoral bloc of the communists and socialists.

⁵⁶ [The PSRM communiqué](#): More and more local elected officials from all over the country welcome and support the electoral bloc of communists and socialists.

5.4. Activities that may be viewed as use of administrative resources for electoral purposes.

As during the previous elections, with regard to the misuse of administrative resources for electoral purposes, we find that relevant legal framework for this issue was not amended. Thus, the Promo-LEX OM reiterates that the legislation on the use of administrative resources during the election period remains insufficient, that is why in observation reports we refer, particularly, to the international electoral standards that provide for a need to ban the use of administrative resources for partisan ends by ruling parties and their candidates, such as the use of government functions and equipments.

In order to identify and report cases of misuse of administrative resources for electoral purposes, Promo-LEX also refers to the definition of administrative resources provided by the Venice Commission and OSCE⁵⁸: *Administrative resources are human, financial, material, in natura (like some benefits from social programmes, including goods and in kind resources) and other immaterial resources enjoyed by both incumbents and civil servants in elections, deriving from their control over public sector: staff, finances and allocations, access to public facilities as well as resources enjoyed in the form of prestige or public presence that stem from their position as elected or public officers and which may turn into political endorsements or other forms of support.*

Thus, in the observation period, at least 121 cases viewed as use of administrative resources for electoral promotion purposes were identified, all the cases involved BECS, as follows:

- *The engagement of public employees in election campaign activities* – 120 cases, BECS is involved. Between 19 and 25 May 2021, 6 articles⁵⁹ on the support of BECS by mayors and councillors of about 120 LPAs in the context of new parliamentary elections of 11 July 2021 (mostly mayors and councillors appointed by PSRM) were published on the official PSRM website. Besides the fact that mentioned officials support BECS, they – holding a civil service position – also call on voters within the LPA area of their office to support and/or vote for BECS.
- *Taking credit for works/services performed from public funds* – 1 case, BECS is involved. On 15 May 2021, (the day after the application was submitted to the CEC), PSRM printed the May issue of the ‘*Socialistii*’ (‘*Socialists*’) newspaper (No 5 (254), with a 230,000 total printed editions). In this issue, PSRM (constituent part of BECS) credited several activities implemented from public money during 2019-2021 (granting single allowance of MDL 700 for pensioners whose income is lower than MDL 2,000, granting single allowance of MDL 1,000 for pensioners whose income is lower than 2,000 MDL; granting monthly allowance in case of premature death of one of spouses-pensioners; increasing the amount of aid for disadvantaged categories of the population during the heating season, from MDL 250 to MDL 500; increasing doctors, teachers and other public sector employees’ salaries; paying MDL 16 thousand for doctors and policemen infected with the COVID-19 virus etc.).

5.5. Cases that can be qualified as gifts with electoral impact

During the monitored period, there were at least three cases viewed as gifts with electoral impact. BECS was involved in two cases, BERU was involved in the third case.

Thus, we note that on 13 May 2021, BERU leader Renato Usatii transferred MDL 600 thousand, alongside MDL 400 thousand allocated previously, for designing the building of the National Philharmonic ‘Serghei Lunchevici’ (destroyed by a serious fire in 2020)⁶⁰

⁵⁸ [Report](#) on the misuse of administrative resources during electoral processes adopted by the Council for Democratic Elections at its 46th meeting (Venice, 5 December 2013) and the Venice Commission at its 97th Plenary Session (Venice, 6-7 December 2013).

⁵⁹ PSRM press-releases of [19](#), [20](#), [21](#), [22](#), [24](#) și [25](#) May 2021 in support of BECS.

⁶⁰ [MDL one million](#), promised by Renato Usatii, today reached the National Philharmonic

As for BECS, we find that on 14 May 2021, PSRM Anenii Noi⁶¹ have disseminated information on social media, stating that representatives of PSRM Youth Guard, in collaboration with town mayorality, have offered the elderly Easter gifts in the form of bags with food products. According to the discussions with the parties involved, it was reported that about 200 elderly people from Anenii Noi district were offered bags with food products.

In the second case, on 23 May 2021, Vitalii Evtodiev, a candidate from BECS lists, gifted a playground for children to the Speia village, Grigoriopol district (Transnistrian region). Thus, the candidate stated in a social media posting: 'On the occasion of the Day of the village, I decided to gift a playground for children'⁶².

5.6. Cases that can be qualified as electoral promotion using images of public authorities

According to Article 52 (8) of the Electoral Code, images representing state institutions or public authorities of the country, other states or international organisations cannot be used for the purpose of electoral advertising. In addition, the combinations of colours and/or sounds that invoke national symbols of the Republic of Moldova or any other state, the use of materials with historical personalities of the Republic of Moldova or from abroad, symbols of other foreign countries or international organisations, or the image of some foreign officials is prohibited.

At the same time, regarding the authority and duties of the Presidency, Promo-LEX believes that the possibility of the President of the Republic of Moldova to support an election candidate appointed by a political party may be questioned, as long as Article 123 (2) of the Electoral Code requires him to quit any membership of any political party during the stage of mandate validation.

Involvement of the President of the Republic of Moldova. On 21 May 2021, official page of the Presidency of the Republic of Moldova in the social media disseminated information on preliminary registration of voters who are abroad. The published message stated: 'Together we won the presidential elections and initiated changes for the better in the country. Together we got the chance to offer the country a clean and responsible parliament that would support a professional and stable government. (...) I look to the future optimistically. I trust the people of the country and I know that there are good times ahead for Moldova'. Therefore, we believe that a message of support was sent to PAS, whose election slogan is 'We start good times'⁶³.

5.7. Outdoor/promotional/on-line advertising

During 12 – 21 May 2021 (25 May – in case of potential electoral contenders who applied for registration), the observers reported at least 150 cases in which electoral advertising was used. According to the findings, most cases involved: BECS – 67%, PAS – 11% and BERU – 10% (see Table 8).

Table 8. Data on using electoral advertising by (potential) electoral contenders

Types of advertising	BECS	PAS	BERU	PPS	PACE	PDM*	PPPDA*	Total
Banners	1		1			1		3
Newspapers, leaflets, brochures, posters, etc.	7			1	1		1	10
Press conferences		2					1	3
Sponsored advertising	1	9	14	7			1	32
Jackets, bags, caps, etc.	78				4			82
Street billboards	14							14
Telephone/on-line surveys		1						1
Video spots:		4				1		5
Total	101	16	15	8	5	2	3	150

⁶¹ Posting made by PSRM Anenii Noi on 14 May 2021.

⁶² Posting on the social media of 23 May 2021.

⁶³ PAS press release: Action and Solidarity Party submitted acts to CEC in order to register for the early parliamentary elections: 'We start good times'.

*PDM and PPPDA submitted their applications for registration on 20, and respectively, 24 May 2021.

The most popular forms of advertising with electoral overtones used until the registration of contenders included the visibility materials (jackets, caps, bags, etc. with the logo of the political party) – 55%, followed by on-line sponsored advertising – 21%.

In the same train of thoughts, we note that during 21 – 25 May 2021, at least 83 cases of using political advertising for 5 electoral contenders were reported (see Table 9). According to the observers, most cases included activities for the promotion of PAS – 89%, BECS and PPS – by 4% each.

Table 9. Data on using political advertising by electoral contenders

Political advertising	PAS	BECS	BERU	PPS	PACE	Total
Banners			1	1		2
Newspapers, leaflets, brochures, posters, etc.	25	2				27
Press conferences	1	1		1	1	4
Sponsored advertising	1		1	1		3
Jackets, bags, caps, etc.	31					31
Tents	12					12
Video spots:	4					4
Total	74	3	2	3	1	83

The most frequent type of advertising included visibility materials (jackets, bags etc.) — 37%, electoral materials (newspapers, posters, leaflets) - 33% and tents - 14%.

5.8. Registration and status of trusted persons

According to the law, on 21 May 2021 CEC established a maximum of 615 trustees for each electoral contender for the early Parliamentary Elections of 11 July 2021⁶⁴. Note that to set the number of trustees, the authority used the number of trustees set for the Parliamentary Elections of November 2014 as a criterion⁶⁵.

We find that only BERU used this right during the monitored period, registering 454 trustees with CEC⁶⁶. Promo-LEX OM reiterates its position and draws attention repeatedly to the importance of using trustees by contenders during the election campaign.

We encourage all contenders to use this right and register their trustees according to the law. We remind that Article 50(1) of the Electoral Code stipulates that trustees assist the election contenders in conducting their electoral campaign, campaign for them and represent their interests in their relations with public authorities, the voters and electoral councils and offices.

We must distinguish between the role trustees play in the electioneering process and that of a citizen, who has the right to debate openly and examine from every angle the electoral programs of the election contenders. Trustees have more rights, including of representation and engagement in the organisation of the election campaign. We believe that citizens who are actively involved in electioneering, may be registered as their trustees, in accordance with the Electoral Code.

⁶⁴CEC Decision No [4860](#) establishing the number of electoral contenders' trustees at the Parliamentary Elections of 11 July 2021.

⁶⁵CEC Decision No [2696](#) establishing the number of electoral contenders' trustees at the Parliamentary Elections of 30 November 2014.

⁶⁶CEC Decision No [4910](#) registering the trustees nominated by RENATO USATÎI Electoral Bloc at the Parliamentary Elections of 11 July 2021.

VI. ELECTION CAMPAIGN FUNDING

During the reference period, CEC set the general ceilings of funds that can be transferred on the 'Electoral Fund' account of the electoral contender and of the initiative group. Thus, the maximum amount that can be accumulated for the financial support of an electoral contender is MDL 20,707,700. If compared to 2019 Parliamentary Elections, we note that the maximum amount of revenues was set to MDL 86,871,856. The significant difference of maximum amounts set in 2019 and 2021 is due to the amendments of the Electoral Code (August 2019) that set a ceiling of 0.05% of the revenues provided for in the State Budget Law for that year. Also, the amount of loans for electoral contenders was set to MDL 50 000, just like during the 2019 Parliamentary Elections.

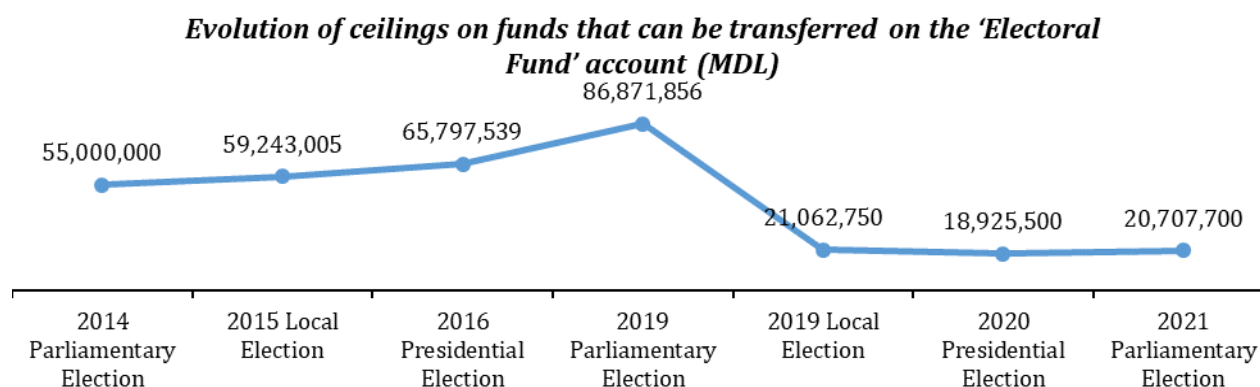
According to Promo-LEX observers, by 25 May 2021, not a single report was published on CEC website by the parties since the beginning of the election campaign (political parties that intend to make transfers in the 'Electoral Fund' account from the account of the political party should present such reports). Moreover, according to the data published on CEC website, by 25 May 2021, only PAS submitted the information about opening the 'Electoral Fund' account, the deadline for presenting that information to CEC being 26 May 2021.

6.1. Setting the ceiling for funds that can be transferred to the accounts of initiative groups and electoral contenders

On 12 May 2021, the CEC decision No 4830⁶⁷, set the maximum ceiling of funds that can be transferred in the 'Intended for the initiative group' account in support of the independent candidate to the position of MP in the Parliament of the Republic of Moldova during the Parliamentary Elections of 11 June 2021. Thus, the maximum amount that can be accumulated in support of an IG is MDL 108,950. Compared to 2019 Parliamentary Elections, we mention that a maximum ceiling of MDL 61 500 was set for IGs established at the level of single-member constituencies⁶⁸.

The same day, by CEC Decision No 4831⁶⁹, it was set the general ceiling of funds that can be transferred in the 'Electoral Fund' account of the electoral contender in the early Parliamentary Elections of 11 July 2021. Thus, the maximum amount that can be accumulated for the financial support of an electoral contender is MDL 20,707,700. Note that during the 2019 Parliamentary Elections, a maximum ceiling of MDL 86,871,856 was set for electoral contenders.

Chart 4



CEC⁶⁷ [Decision](#) No 4830 of 12 May 2021 setting the ceiling of funds that can be transferred on the 'Intended for the initiative group' account in support of the independent candidate to the position of MP of the Republic of Moldova during the Parliamentary Elections of 11 July 2021.

⁶⁸ The ceiling set in 2019 referred to single-member constituency. For the national constituency it was not necessary to establish an IG and the independent candidates did not have the right to run in elections (only at the level of single-member constituency).

CEC⁶⁹ [Decision](#) No 4831 of 12 May 2021 setting the ceiling of funds that can be transferred on the 'Electoral Fund' account of the electoral contender for the Parliamentary Elections of 11 July 2021.

Thus, we find that after the amendment of the Electoral Code (August 2019) and after setting a ceiling of 0.05% of the revenues provided for in the State Budget Law for that year, the maximum limit set for the accumulation of revenues during the campaign is reasonable, but much lower as compared with the previous elections (see Chart 4).

6.2. Setting the amount of loans for electoral contenders

On 12 May 2021, by Decision No 4832⁷⁰, CEC approved the amount of the loan without interest rate granted to the electoral contenders. The amount set for one political party, one socio-political organisation or one electoral block is MDL 50 000 (similar to the amount set in the context of 2019 Parliamentary Elections). At the same time, the amount of loan for an independent candidate was set to MDL 10,000. According to CEC, a Regulation on how to grant loans without interest rates to electoral contenders will be developed.

6.3. Submitting the report of the political party at the beginning of the election campaign

According to the Article 43(7) of the Electoral Code, political parties that will make transfers into the 'Electoral Fund' account shall submit with CEC a financial report on the balance of funds of the party. According to Item 45 of CEC schedule⁷¹ the above mentioned report shall be submitted on the date when the election campaign of the electoral contender begins.

By 25 May 2021 not a single report was published on the official CEC website by political parties that intend to make transfers into the 'Electoral Fund' account.

6.4. Opening bank accounts, appointing treasurers and electoral contenders reporting to CEC

According to Article 41(2) of Electoral Code, the electoral contender shall notify CEC about *the person in charge of their finances* (treasurer). According to the Item 46 of CEC schedule⁷² electoral contenders shall confirm the persons in charge of finances (treasurers) when the candidates are registered in the electoral race or right after their registration.

According to the data published on CEC official website, and according to the decisions on the registration of electoral contenders⁷³, it was found that all those eight candidates registered until 26 May 2021 appointed treasurers with CEC (see Table 10).

According to Article 41(2) of the Electoral Code, the electoral contender shall inform CEC about *opening or not opening the 'Electoral Fund' account*. According to Item 47 of CEC schedule⁷⁴, electoral contenders shall submit the information about opening or not opening the 'Electoral Fund' account within three days after the registration.

According to the data published on CEC official website, until 25 May 2021, only PAS submitted the information about opening the 'Electoral Fund' account (see Table 10). Note that the deadline for submitting that information by those six electoral contenders registered on 21 May 2021 was 24 May 2021. At the same time, CEC – within 48 hours from the receipt of the reports – shall publish them on its official website. Thus, the deadline for publishing the reports is 26 May 2021.

According to Article 43(1) of the Electoral Code, the electoral contender shall submit with CEC, within *three days after opening the 'Electoral Fund' account*, an early report about the funds accumulated and the expenses made during the election campaign.

CEC⁷⁰ [Decision](#) No 4832 of 12 May 2021 setting amount of loan without interest rates granted to the electoral contenders for the Parliamentary Elections of 11 July 2021.

⁷¹ [The schedule](#) for organising and conducting early Parliamentary Elections of 11 July 2021, approved by CEC Decision No. 4817 of 5 May 2021.

⁷² Ibidem.

⁷³ CEC Decisions No 4854, 4855, 4856, 4857, 4858 and 4859 of 21 May 2021 on the registration of candidates [BECS](#), [CAP](#), [CC](#), [BERU](#), [PAS](#) and [PPS](#).

⁷⁴ [The schedule](#) for organising and conducting early Parliamentary Elections of 11 July 2021, approved by CEC Decision No 4817 of 5 May 2021.

By 25 May 2021, not a single report was published on the official CEC website by registered electoral contenders.

Table 10. Opening 'Electoral Fund' accounts, appointing treasurers and submitting weekly reports to CEC

Contender	Submitting the file	Registering the contender	Appointing the treasurer	Report of the party at the beginning of the campaign	Opening the 'Electoral Fund' account	Early report (3 days after opening the account)
PACE	14.05.2021	21.05.2021	21.05.2021			
CC	14.05.2021	21.05.2021	21.05.2021			
BERU	14.05.2021	21.05.2021	21.05.2021			
PPS	14.05.2021	21.05.2021	21.05.2021			
PAS	14.05.2021	21.05.2021	21.05.2021		21.05.2021	
BECS	14.05.2021	21.05.2021	21.05.2021			
MPSN	18.05.2021	25.05.2021	25.05.2021			
PDM	20.05.2021	26.05.2021	26.05.2021			

VII. HATE SPEECH AND INCITEMENT TO DISCRIMINATION

Between 11 and 24 May 2021, Promo-LEX OM identified at least 23 cases of hate speech and incitement to discrimination in the public space, in the media and online in the Republic of Moldova. Hate speech and incitement to discrimination took the form of xenophobic, racist, sexist discourse, as well as various discriminatory or intolerant forms of expression that promoted stereotypes and prejudices in public space.

Most cases took place in the online environment, social networks being used frequently (13 cases). Another 9 cases occurred in the online press (3 cases) and during TV shows (5 cases), and 2 cases were recorded in two public events (press conferences).

The criteria underlying cases of hate speech and incitement to discrimination were: political affiliation, sex / gender, age, opinion, colour, professional activity, race, nationality, ethnicity, sexual orientation and disability.

The groups affected by this type of discourse were: electoral contenders, politicians, members and supporters of political parties, women, men, the elderly, migrants, Muslims, Romanians / speakers of Romanian language, unionists and people with disabilities.

7.1. Intolerance generated by electoral contenders / politicians

During the reporting period, six electoral contenders / politicians used intolerant forms of expression: Renato Usatii (BERU) - five cases and Vladimir Voronin (BECS), Octavian Ticu (PUN), Vasile Bolea (BECS) and Vladimir Odnostalco (BECS) - one case each.

Renato Usatii used intolerant forms of expression in five cases. Three of them were recorded in the same online show - 'Freedom Territory', promoted on the Facebook page, on 17.05.2021, a case in the show 'In PROFUNZIME' on Pro TV on 13.05.2021, and a case took the form of a meme distributed in the 'Stories' section of his personal Facebook page on 12.05.2021. These messages targeted his opponents from the PCRM - PSRM electoral bloc, the AUR party, as well as the local officials.

Of the five registered cases, three were negatively associated with LGBTI people in order to denigrate his opponents, Igor Dodon and Vladimir Voronin, as can be seen in the following two examples:

I would have believed Voronin's statement more if he had said that another Tirdea would be born from his sex with Dodon - this is more believable than... I just gave them a better option.⁷⁵

I couldn't understand any more who is the groom, who is the bride in this block, who is the godfather, who is the godmother. But I understood one thing - Igor Dodon is already desperate and the fact that he decided to create this block... [...] On 11 July, it will be for the first time in the history when not only the bride but also the groom undress at the wedding.⁷⁶

On 19.05.2021, during the show 'Secrets of Power' on Jurnal TV, in the context of discussions about the PCRM - PSRM electoral bloc, **Octavian Ticu** said:

From my point of view, it is the socialists and communists' cry of despair to bring a senile old man with whom tomorrow, the day after tomorrow, something can happen in the parliament and in the given situation to make him the saviour of the left.⁷⁷

⁷⁵ <https://www.facebook.com/RU1.md/videos/486171849101411/>

⁷⁶ <https://www.facebook.com/RU1.md/videos/299393785148543/>

⁷⁷ <https://www.facebook.com/secreteleputerii/videos/168369715126495>

By using the term 'senile old man' in relation to Vladimir Voronin, Octavian Ticu admitted a discriminatory language based on age and thus promoted the idea that a person's age is an impediment for involvement and participation in political life.

On 13.05.2021, during the TV show on TVC 21, Vladimir Voronin, the president of PCRM, candidate for the position of MP from the PCRM - PSRM electoral bloc, said:

What is holding back NATO? So that tomorrow we may wake up with NATO soldiers? Is this what you want, dear voters, when you now vote for parliament so that they will vote for the abolition of the country's neutrality? So these will come here... NATO soldiers and you will have dark-skinned children, not only white skinned? Do you want that? For the Romanian gendarmes to come after them.⁷⁸

Vladimir Voronin's speech is primarily a form of manipulation, insinuating that NATO troops could be sent to the Republic of Moldova, although no public institution with responsibilities in the field of defence has announced or confirmed such information. Secondly, Vladimir Voronin's statements represent a discourse of fear, through which NATO troops and 'Romanian gendarmes' are associated with a 'danger to the statehood' of the Republic of Moldova.

At the same time, Vladimir Voronin used racist language in an attempt to draw attention to the invented 'danger'. The birth of children of a different colour than white is presented by Vladimir Voronin as something unacceptable. In this way, Vladimir Voronin not only manipulated, but also promoted hatred towards foreigners and people of a different colour.

We draw attention to the fact that this speech complements the xenophobic message published in the public space through street banners, placed by PSRM, which was taken over and promoted by BECS: 'Moldova is in danger. We do not give the country to foreigners'.



Source: www.zdg.md

Another manipulative and inciting discrimination message promoted during the reporting period is the one stated by **Vasile Bolea**, PSRM MP. During a press briefing⁷⁹ in the Parliament of the Republic of Moldova, organized on 13.05.2021, he said the following:

At the same time, we see that at European level, as well as in the Moldovan society, this is categorized as a danger to the traditional values, which threaten the future of the society, the

⁷⁸ <https://www.youtube.com/watch?v=ddUYzxWyal8&t=4087s>

⁷⁹ <https://www.facebook.com/198610193494849/videos/767359447307724>

future of our families. As a parent of two children, I want to tell you that this bothers me and other colleagues of ours.

The Constitution of the Republic of Moldova enshrines that the family is founded on the basis of the relationship between a man and a woman. At the same time, we believe that the Constitution should be improved in this regard and we come up with this idea, to amend the Constitution, to improve the provisions of Article 48 of the Constitution, where we indicate in addition that the family is based on the relationship between a man and a woman, to introduce other provisions, such as the following: the state prohibits the registration of marriages between same-sex partners and the following provision: that parents of children are the father - male parent and mother - female parent⁸⁰.

Since the Constitution of the Republic of Moldova, by Article 48 (2), clearly establishes the definition of the family, the statements of the MP Vasile Bolea only created a false problem, which indirectly promoted the discrimination of LGBTI people. The sexual orientation and gender identity of each person are integral parts of his/her personality and are one of the most important elements of self-determination, dignity and freedom.

The Coalition for Inclusion and Nondiscrimination and other civil society organizations published a reaction calling the statements an act of 'electoral promotion' and a diversion of electoral debates around elections due to false topics and the invention of non-existent dangers⁸¹.

Also, following this idea, on 19.05.2021, during a press briefing in the Parliament of the Republic of Moldova, MP **Vladimir Odnostalco** presented LGBTI people as a 'social danger' for the traditions and families of Moldova, saying:

Everything that we have done over these two years, it can collapse if these gentlemen come to power, who have absolutely nothing to do with the Moldovan identity, with our traditions, with our customs. And if traditions and customs disappear from our people, what they are trying to clean up today, what they are trying to make sterile today, drawing a line of equality between a same-sex family and a normal family, where there is a mom and dad, a man and a woman, it will be scary.⁸²

7.2. Intolerance promoted against electoral contenders/politicians

Of the 23 cases of hate speech or incitement to discrimination, in 9 cases were targeted contenders/potential contenders/politicians: Vladimir Voronin (BECS) – 2 cases, Maia Sandu (President of the Republic of Moldova) – 2 cases, Natalia Albot (activist and journalist included in the PAS list, who withdrew her candidacy on 21.05.2021) – 2 cases, Igor Dodon (BECS), Dumitru Diacov (PDM) and Vasile Bolea (BECS) – one case each.

In the case of Vladimir Voronin, the intolerant messages were based on the age criterion, as can be seen in the message whose author is Fiodor Ghelici, activist, published on his personal Facebook page, on 13.05.2021:

'Dodon decided to take away voters from Voronin, and Voronin, due to his senile marasmus, did not understand that he himself had become a traitor.'⁸³

Natalia Albot was targeted in two cases of sexist discourse, which aimed to denigrate her and diminish her professional abilities. An example in this sense is the message of Valeriu Reniță,

⁸⁰ <https://www.facebook.com/198610193494849/videos/767359447307724>

⁸¹Coalition for Inclusion and Nondiscrimination, '[Civil Society Reaction](#)' to the statements of Moldovan Socialist Party MPs on the refusal to ratify the Istanbul Convention, the ban on same-sex marriage and the introduction of criminal liability for 'promoting homosexuality', <https://promolex.md/20253-reactia-societatii-civile-la-declaratiile-deputatilor-partidului-socialistilor-din-republica-moldova-cu-privire-la-refuzul-de-a-ratifica-conventia-de-la-istanbul-interzicerea-casatoriilor-intre-perso/?lang=ro>

⁸² <https://www.facebook.com/198610193494849/videos/191480106163475>

⁸³ https://www.facebook.com/permalink.php?story_fbid=2868103706797003&id=100007922055601

journalist, who, on 15.05.2021, on his personal Facebook page, published a picture of journalist Natalia Albot, dressed in a short dress on a sofa, accompanied by the following message:

I think that any man with healthy instincts would lie, if he does not admit, at least, that he is provoked, if not one hundred percent excited by this obvious sex appeal! Even if the situation in which she was caught or let herself being caught is just an inspired staging. [...] But when you have an overview from Ottawa or Paris, you realize, like Nata, that the true vocation of Moldovans is not to wash foreign buttocks, but flaunt their own.⁸⁴

Maia Sandu was also affected by sexist discourse, as can be seen from the citation below, its author being the activist Fiodor Ghelici, from a video published on the Facebook page on 24 May 2021:

I was proud and at the same time ashamed that there was no man in Moldova who would take on this heavy burden – to lead the Moldovan people. I saw a woman in front of me – small, fragile, but having a character made of steel.⁸⁵

Fyodor Ghelici's message induces the idea that the responsibilities and duties arising from the office of President of the Republic of Moldova can be assumed and fulfilled only by a man, since for a woman, regardless of her professional training, it is a burden (*'this heavy burden'*).

Five other recorded cases targeted other social groups: migrants, foreigners, European politicians, members of political parties and their supporters.

The Promo-LEX Association draws attention to the fact that hate speech and incitement to discrimination affect the whole society, and the use of this type of speech in public space, including through various forms of manipulation and disinformation, increases the level of intolerance in society and can lead not only to humiliation, marginalization and denigration, but also to human rights violations and acts of violence.

⁸⁴ <https://www.facebook.com/eu.valeriu.renita/posts/334171014987500>

⁸⁵ https://www.facebook.com/permalink.php?story_fbid=2875762969364410&id=100007922055601

VIII. ELECTORAL EDUCATION ȘI INFORMATION

8.1. Training and information activities organised for voters by CEC and CICDE

Training activities. During the monitored period, the Centre for Continuous Electoral Training (CICDE) and the CEC provided online training for civil servants of level-one local public authorities, responsible for the State Voter Register, for DEC members (first stage) and persons responsible for the finances of the electoral contenders. During the trainings, the trainees were informed about important matters such as: resolving address conflicts; assignment to a polling station; voter status; using the nomenclature; the establishment and working modality of the electoral council; complaint review by electoral bodies; measures to prevent COVID-19 infection in the electoral process; how to prepare and present the report on the financing of the election campaign, as well as the aspects of legal liability for violating the relevant rules.

Information activities. The CEC page contained information on the purpose and stages of the procedure for preliminary registration of citizens residing in a locality on the left bank of the Nistru River and those abroad, the appointment of DEC members, the participation in voting of students and pupils with the right to vote, the lists of candidates for the position of deputy of a candidate registered in the electoral race and the meaning of the most confused terms and concepts specific to the electoral field (Electoral Dictionary).

On 25 May 2021, the CEC together with the MFAEI held a press conference on the subject of organising early parliamentary elections – voting abroad. The focus was on preliminary registration, ensuring the right to vote in safe conditions, opening PSs abroad and their geographical distribution, PEB composition, the election campaign and vote validity based on the experience of the 2020 Presidential Elections.

At the same time, CICDE released a video material with information about the importance of the preliminary registration procedure and the possibilities of involvement in the early parliamentary elections of the citizens of the Republic of Moldova abroad.

Also, on 21 May 2021, CICDE launched an Electoral Quiz, through which anyone interested in the July 11 election has the opportunity to take an online test on electoral subjects. The purpose of the application is cognitive, as well as motivational, the citizen having the opportunity to assess their knowledge of certain electoral procedures, at the same time, while being determined to improve their level of knowledge on the organisation and conduct of elections.

RECOMMENDATIONS

To the Government of the Republic of Moldova

1. Adopt an additional decision on specifying the allocated financial means according to the expenditure estimate approved by the Central Electoral Commission for the full coverage of the expenses related to the organisation and conduct of the early parliamentary elections of 11 July 2021.

To the Central Electoral Commission:

2. Adjust all CEC regulations relevant to the ongoing election to the provisions of the Electoral Code on the organisation of parliamentary elections based on proportional representation⁸⁶.
3. Establish and distribute the polling stations abroad in accordance with the criteria established by the Electoral Code by using mathematical formulas that would ensure their equal share.
4. Expressly regulate the access of observers to the online meetings of the district electoral councils.
5. Promptly respond to all cases of hate speech and incitement to discrimination coming from the candidates during the election campaign.
6. Adopt a code of conduct for political parties and electoral contenders, as well as a mechanism for monitoring and sanctioning hate speech during the election campaign.
7. Publish on the official website within legal time-frame documents and information related to the financing of the election campaign (reports of political parties that intend to make transfers to the 'Electoral Fund' account, information on the opening of the 'Electoral Fund' account by the candidates, etc.).

To the electoral contenders:

8. Register and actively involve in the election campaign the institution of 'trustees' as a source of people who help the candidates in organising election campaigns, electioneer for them and represent their interests in relations with the public authorities, voters, electoral councils and bureaus.

To local public authorities:

9. Use the powers assigned by the Electoral Code regarding the delegation of members to lower electoral bodies.

To the Broadcasting Council:

10. Include the component for monitoring hate speech and incitement to discrimination in the process of monitoring the observance of pluralism in the audiovisual media during electoral campaigns.

⁸⁶ The complete list of regulatory acts that according to OM Promo-LEX need to be adjusted is presented on page 14.

LIST OF ABBREVIATION

para. – paragraph

LPA – Local Public Authorities

art. – Article

AUR - Political Party "ALLIANCE FOR UNION OF ROMANIANS"

BE – Electoral Bloc

EBCS – Electoral bloc of Communists and socialists

EBRU - Electoral bloc 'RENATO USATII'

PEB – Precinct Electoral Bureau

BRP - Bureau of Reintegration Policies

PCA - Political Party "Party of Collective Action - Civic Congress"

CEC – Central Election Commission

DEC – level-two District Constituency Council

NECPH – National Extraordinary Commission for Public Health

JCC - Joint Control Commission

l. – letter

MFAEI - Ministry of Foreign Affairs and European Integration

OM – Observation Mission

PMSN – Professionals' movement 'Speranța – Надежда'

MHLSP - Ministry of Health, Labor and Social Protection

mun. – Municipality

No – number

OSCE – Organization for Security and Cooperation in Europe

OSCE/ODIHR – OSCE Office for Democratic Institutions and Human Rights

LTO – Long Term Observer

STO – Short-Term Observer

PACE - Political party Party We Build Europe Home 'PACE'

PAS – Action and Solidarity Political Party

DPM – Democratic Party of Moldova

PP – Political Party

PPŞ - 'Sor' Political Party

PSRM – Political Party of Socialist from Moldova

p. – Item

SRV - State Register of Voters

PS – polling station